#### IN THE UNITED STATES BANKRUPTCY COURT

#### FOR THE DISTRICT OF SOUTH CAROLINA

In Re:

Sand Castle South Timeshare Owners Association, Inc.,

Debtor.

Sand Castle South Timeshare Owners Association, Inc.

**Plaintiff** 

VS.

Earl Hanvey, Jr., Kenneth Watson, Charles Smith, Michael Wolf, Kimberly Jordan, Joyce Robinson-Bell, John Le, Chad Shealy, Linda Radcliffe, Nick Gurick, Benny Graham, George Moore, Jr., Rosemary Pope, Eric Surratt, Willie Dexter, Jocelyn Doyon, Jon-Paul Miron, David Keith, Sue Marks, Eric Rivera, Jeffrey T. Sargent, Dorothy J. Smith, Jeffrey Taylor, William Thomas, Dennis D. Tucholski, Arturo Vazquez, Zereda M. Wells, Thomas Whalen, James Baltzell, Jeffrey Burdick, George P. Burfeind, John Guadalupe, Jared Hendrick; James Lundy; Lesley Lyttle, Westley Williams, Jr.; Madeline Wood; Charles Jackson, Taji Richardson, David Schmidt; Leonard Banks, Louis Blake, Jr.; Estate of Sandra Coombes; Victor Diaz, III, Charles Evans, Frank Hawkins, George Kirby, Rosalie Martin, Andrew Mears, Mary J. O'Neal, Audrey B. Cahill, Nelson Clayton, Kenneth Conley, Allen Garner, John Graves, Stephen Harvilla, Oioma Edeh Herr: Eldon Hopkins, III; Michael Leininger; Calvin McCormick, Lester, David Sr.; Mclaughlin; Lee McLean; Johnny Murray; Charles Sparwasser; James Danford, Jr., Michael Jones, Ryan England, Sanders Fairley, Jason Fields, John Lawson, Sr., Lance Taylor, James Wagner, Jr., Mick Miller, Charles Case No. 19-02764-jw

Chapter 11

Adversary Proceeding No. 19-

#### **COMPLAINT**

(Partition by Sale; Sale of Property Under 11 U.S.C. §363(h); Setoff; Abandonment of Interest and Quiet Title)

Phillips, Michelle Hillman, Michael Tanksley, Janice Polesky, Gary Berry, Dennis Wright, Richard Edwards, Eduardo Tanaka, Morris Reid, III, Susan Preston, Albert Walker, Kimberly Miller, Michael Lyons, Gregory Dykes, Nicholas Bailey, Larry Krause, Patrick Froncek, Haughton Purser, Michael Ammons, Connie Slade, Justin Ooten, Mary Jackson, Lance Heasley, Steward Strothers, III, Alexis Bennett, Michael Means, Kevin Hammond, Rejimon Varghese, Susan Blevins, Jimmie Blankenship, Jr., Wieslaw Cierpka, John Lockhart, Mark Pennington, Waltraud Booth, Marvin Kemmerer, Gregory Lane, Christine Kays, William Wolf, Robert Vittitoe, John Welborn, Grover Miller, Timothy Sargeant, Ventura Keels, Gary Casterline, Jr., Beth Johnson, Daniel Lambo, Jr., Eloise Kiaku, Lisa Fields, Brad Caudill, Thomas Hickle, Djani Darmanovic, Jean Morrison, Robert Campbell, Jr., James Moore, James Jacks, Wesley Pursiful, Gregory Tackett, Glenda Monroe, Jessica Fuller, David Hanner, Charles Isaac, James Myers, Ann Dyjak, Susan Noack, Ervin Tisdale, Sr., Ryan Thurman, Timothy Shaw, Joe Flowers, Richard Ranson, Luis Baires, Jerry Carter, Stacey Trotman, Bobby Rhodes, Benjamin Carroll, Anatoly Naritsin, Dennis Link, Janis Ikaunieks, Brian McCann, James McKenna, Ralph Bolt, Christopher Crousser, Vincent Passalacqua, Anthony Smith, Leatha Williams, Leslie Shultz, Andrew Southerland, Osvaldo Morales, Matthew Dell'Orso, Michael Evola, Kim McLaughlin, Roy Ayers, Tina Gerbino, Jessie Leonard, Dennis Donnelly, Thomas Chapman, Aaron Jolly, Michael Hudson, Orlando Living Trust (Michael E. Orlando and Christine M. Orlando, Trustees), Aaron Fowler, John Earnshaw, James Martin, James Russell, Lillian Sydenstricker, Harriet Durrwachter, David Miller, Barbara Bielawski, Frank Tracy, Stacey Smith, Mary McIntosh, Silcock, Shyella Lisbon, Denis Edward Zywczok, Ronald Carter, Stanley Griffin, Kevin Kube, Ruben Tacas, Rudolph Davis, Nicholas Kleifgen, Paul Wassell, Chester Boroski, Sr.,

Robert Wert, Jr., Cassandra Bland, Norris Detter, Nelson Fowler, Anthony Breeden, Thomas Meta, Virginia Woodcock, Arther Roberson, Sr., Kalyan Anumula, John Cindea, Evelyn Gaddy, Gordon Smith, Cecil Piansay, Connie Mauldin, Michael Coats, George Nicholas, Jr., Layden Wilson, Monte Forte, Veronica Scales, Vivian Patrick, Donna Clark, Anthony Pickhinke, Raymond Fletcher, Warren Perkins, Wanda Hall, Frank Faith, James Muzeni, Joyce Stallings, Donna Drennen, Deborah Tolles, Winston Clarke, Steven Durham, L. Kocher, John Harkness, Pearline Hutto, Isaac Bacoat, Jennifer Dagenhart, Joann Cook, Karen Vaught, Morgan Lane, Hugh Brunner, Andre Belisle, Charles Henkey, Christine Haynes, David Sosa, David Shaw, David Collins, Jr., Jacquelyne Holman, Judith Cripe, Mark Williams, Rosemary Lynch, William Blackwell, Terry McKinney, William Addison, Shawntay Anthony, Rodney Brunson, Clair Fairbrother, Terry Grove, Pamela Helton, Jesse Leake, Jr., Francis Ralston, Joseph Reinhardt, Mary Tutterow, Charles High, Wayne Montague, Grady Harmon, Alan Templeton, Larry Hatley, Michelle Hughey, Andrea Phillips, Jennifer Young, David Price, Joshua Shirley, James Lajsic, Daniel Fett, Kristin Duncan, Kevin McCray, Alice Mahon, Robert Torrisi, Joshua Ford, Robert Coffey, Ellis Pardue, Phillip Shaw, John Zimmerman, William Murphy, Jason Bolin, Clyde Caudle, Leonard Gunn, Jr., Steven Mangus, Curtis Suber, Todd Lutkenhaus, Kyleen Oxendine, Sandy Huggins, Kenwick Brown, Christopher Edwards, William Griffith, Omar Jenkins, Larry Lee, Jr., Carlisle Goforth, Jr., Levente Berry, Troy Jones, Felicia Foulks, Arleathia Beavers, Jesse Kiger, II, James Hunter, Douglas Young, John Cortina, Ronnie Bryant, Thomas Pytko, Rich Evans, Jerry Gee, III, John Mulder, Tarrin Horne, Shawn Brehm, Richard Bailey, Jr., Marian Stepniewski, Mark Venable, Donna McCraw, Amy Case, Gerry Wilson, Brent Mollette, Frances Cooper, Karen Brooks, Mary Prouty, William Black, Kenneth Hobson, Willie

Mathis, Ralph Casto, Anna Viers, Jane Sander, Christopher Wilcken, Daniel Bell, Charles Compton, Jr., Lisa L. Williams, Christine McCracken, Andrew Pfefferkorn, Jr., Cheryl Ann Black, Wayne White, John Miller, Elton Pierson, Thomas Myers, John Schaub, Timothy Brown, Linda Atkinson, James Phillips, III, Timothy Colby, Darrell Hunt, Jennifer Nixon, MHS Associates, LLC, Chelsea Schrader, Letitia Leonard, Celso Aabano, Damitchell Moore, John Spears, Henry Smoke, III, Christen Frye, Robert Craig, Jr., Sherry Williams Gee, Lisa Kurowski, Russell Runion, Shane Hewitt, Germari Sharper, Edwin Smith, Daniel Harris, Ricquel Pratt, Norman Bogard, Derek Manns, Cynthia Billington, David Cox, Myron Ravenel, Robbie Atkins, Zakiya Y. Bakari-Griffin, Bryan Barber, Erica Renee Beckett, Paul Beeson, Tracy Bodkin, Edward J. Bucia, Yolanda Leon Camacho, Katie Campbell, Dara Cohen, Johnny Crawford, Robert Demarest, Jr., Daniel Elyard, Randy Findley, John Groce, Jr., Melissa Latoria Hairston, Elizabeth Hawks, Alice Johnson, Ronald Knipp, Patrick Landry, Robert W. Lena, Steven Lowder, Rogelio Lynch, Chad G. Ramsey, Alfred Saylor, David Stewart, Craig Treece, Ruben Vasquez, Robert Vaughan, Maurice Walker, Sr., Charles Witherspoon, Jr., Christy Garrett, Gregory Kranefuss, David Miller, James E. Sutton, Robert Woods, Larry Atkinson, Robert Beatty, Christopher Bennett, Vernell Cherry, Barbara Clark, Adelbert Cobbin, Tomesha Crowder, Robert Crum, George Dry, IV, Ted Furr, Jr., Jerome Hardy, L. Noblett, Lisa Hargraves, Gregory Henderson, Fallon Hill, Cynthia Holder, Brenda Key, Billie Locklear, Catherine Monte, Theresa Moore, Johnston Murray, Howard Norton, Savonita Peeler, Laymon Pickle, Jabez Powell, Willie Preston, Eric Scott, Harrison Shell, Steven Smith, Lawrence Stuckey, III, Rex Uhl, Sherman Wallace, Jr., Robert Walton, Cameron Wesley Sr., Chet West, Hugh Whitley, Douglas L. Williamson, John Williford, Shirley Ballard, Richard Berry, Richard Bowling, Jeri Brannen, H. Brooks, Karen Daniel, Dorcas Delgado,

Je'Renia Foster, James Gaulding, Christopher Gordon, Joseph Gregory, Lateasha Harris, Anthony Hodges, Christine M. Hodges, Michael Jones, Sanford Jones, Phil Kesterson, Sr., Cheyenne Lawson, James Long, Tiffany Marrow, Joseph McJunkins, Larry Neal, Major NewKirk, Charles Patrick, Joseph Ratliff, Dutch Reuschel, Frederick Rhew, Guy Robbs, Nicky J. Smyre, Sue Taylor, Buddy Thompson, Sr., Thomas Tricka, Darrien S. Tutt, Nancy Vazquez, Dallas Waters, Arnold Wilkerson, Reamus Williams, Angele Wright, Darren Lewis, Jon Sarlea, Patrick Lockhart, Robert Joyner, Jr., John Howell, Todd Lowe, Tammy Baker, Geovonda Martin, Monique Gregory, Terry Muth, Wanda Johnson, Larry Mustain, Sandra Cooper, James Adams, Keith Williams, Jonathon Schlax, Randall Mueckl, Marcia Ragin, Grantham McNeill, James Treadaway, Ronald Tharp, Sheila Pierce, Clifton Turner, Jimmy Reum, Jr., Kenny Patterson, Benjie Keith, Christopher Pridmore, Allison Patrick, Latoya Blair, Kenneth Robertson, Jae Adle, Dante Palmer, Sr., Joshua Conerly, James Lynd, Robert Solomon, Jr., John Kohn, James Wilson, Marie Tressler, Paul Finch, Jeffrey Anderson, Dorothy Hurst, Kimberly Magruder, Rodney White, Jonathan Merritt, Elvis Johnson, Anthony Saunders, Debra Taylor, Adam Merrell, Suzanne Ellers, Ronnie Crimes, Sr., Christopher Daniels, Sam Atkins, Jr., Nikkie Evans, Lisa Boykin, Lynn McAdams, John Johnson, James Corbin, Erica Everette, Gary Jones, Danny Bryant, Edward Brown, Richard Henry, Joyce Clark, Lucia Keiger, Tyronza Wesley, Kenneth Kimber, Melondy Jones, Margaret Steed, Barbi Dillard, Ricky Lyons, Joyce Hoffman, Joshua Adams, Sheila Edwards, W. Louis McDonald, David Foltz, Roy Ellison, Jerry Jackson, Jr., Devonue Hinson, Gary Hall, Graham Davis, Jr., Christopher Snider, Nicole Bubb, Timothy Borchardt, Nikolay Sandul, Earl Thompson, Kendell Thomas, Aaron Lambert, Dwayne Simmons, Charles George, Terrence Mooney, Vernon Allison, David Kinney, Nannie Burton, Cherlyn Nzongola, Susan

Griffin, Georgia Rhodes, Calvin Fleming, Raoul Chasse, Carla Smith, Jana Dew, Patrick Daugherty, Luz Mendez, Davey Sanderson, Laura Dyal, Jessica Short, Laura Richards, Bobbie Owens, David Moorman, Jr., Connie Barrington, Keith Lowery, Howard Pelton, III, Joseph Teague, Dorothy Miller, Donna Martin, James Farris, Juanita Miles, Nicholas Richer, Cheryl Johnson, Charla Roby, Sandra Mosher, Kimberly Eaton, Tara Hawthorne, Billy Joe Parrish, Lonnie Oakley, Jr., E. Dusin, Alan Sneed, Melvin Fox, Azeem Holman, Kathryn Rogers, Melvin Dixon, Ted Gean, Gloria Draughon, Pamela Allen, Kimberly Murrell, Billy Lockhart, Jr., Nakesha Walton, Kiwanna Chapman, Jerry Uadiski, Murrine Parra, Shawn Cole, Diane Artis, Herman Eagle, Delphine Ferguson, Brian Shelley, Robert Wiggins, Alvin Cooper, Yushanda Felder, Anthony Pompey, Robert Carroll, Sokpheak Doeung, Amy Gage, Jeffery Story, James Morgan, James Respus, Bertram Henry, Angel Fairley, Spencer Boose, William Callahan, Kenneth Smith, Kenneth Person, Mark Porter, Shonda King, James Clontz, Bronna Poole, Terrace Solomon, Shelly Mercer-Jamison, Walter Stokes, William Slaughter, Charles Wagner, Michael Rubino, Bill Mills, Bryan Manion, Charles Hatcher, Sr., Cleveland Samuels, Daniel Root, Derrick Greene, Dijon Taylor, Etta DeRizzio, Floyd Daniels, Jr., James Smith, Jr., John McCauley, Julie Maloney, Katrina Robinson, Leonard Clark, Michael Tucker, Michael Russo, Natalie Pitman, Norman Deal, Ronald Althenn, II, Sandra Isenhour, Denorise Allen, Almond Davis, Belinda Deline, Michael Edmunds, Juanita Howell, Jeffrey Mooney, Annette Moosavi, Paul Porfeli, Sharron Smith, Kenneth Walker, Doye Young, James Byker, Christopher Roach, Earnest Turner, James Hill, Melissa Hoots, Linda Bangs, Tracy Boone, William Brisson, Jimmy Camp, Scott Crane, Stanley Gales, Susan Ganson, Doris Heath, Allen Jackson, Inez Kelly, Segee Holley, William Thornton, Robyn Weatherford, Kevin Penny, Wendy Stein, Michael Madison, **Timothy** 

Reinke, Sr., Rex Delph, Donald Key, Reginald Hopkins, Richard Goodwin, Chris Risby, Kismith James, Durland Mosher, II, Joshua Kenyon, Hubert Jacobs, Marion Hammond, Michelle Peters, Wayne Snow, Emily Jordan, John Whitworth, April Tyler, Robert Bronson, Terry Helms, Jimmy Moore, Kenneth Elmore, Nehemiah Fedd, Ernest Harris, Gary Wynn, Tammy Bennett, Billy Fife, Jr., Andy Boyette, Ronald Hunter, James Bogart, Nora Squires, Van Smith, Samuel Adams, Robert Craig, Neil Hedden, Paul Mier, Roland Tomah, Donna Ganza, Grover Damron, Bernadine Sampson, Donald Kelley, Steven Baldwin, Patricia Canton, Sandra Utria, Edward Chavis, Lynn Swinney, Jr., Gary Hughes, Jacqueline Green, Michael Masotto, Timothy Hairston, John Davenport, Erica Fisher, Bonnie Goard, Richard Lewis, Randy Patterson, David Richardson, Josy Graham, Susie Mincey, Geno Lawson, Clarence Toliver, Jr., Mamie Murphy, George Davis, George Petitt, III, Ronald Worsham, Felicia Lawrence, Archie Robertson, C and S Resort Getaway, LLC, Michael Lynch, Ashley Steen, Betty Wilson, Joanne Sher, Russell Duncan, Henry Yeldell, Rosendo Bryden, Shaunita Marshall, Robert Wilks, Sr., Meoshi Manns, Adam Thompson, Joseph Tonsel, Jr. Patricia Carey, Vacation Ownership Experts, ETT, LLC, Geoffrey Rhodes, William Clay, Ronald Dobbins, Carlette Priester, Petrus LLC, Vacation Rentals, Nicole Petrus, O'Towers Wholesale LLC, Elton Ross, Rodney A. Mason, Burchfield Vacation Rentals, LLC, Thomas G. Carslay, Albert Schaefer, Joseph Wright, Sr., Morgan Mills, Albert L. Campbell, Rodridgus Jones, Glennis McElveen, Carlos Reynolds, Brian M. Buch, Howard Anderson, Angel Onwardo, LLC, L. Norton Pope, Club Resorts, Crystal Eddy, Samantha Cooley, Stephen Coyle, William Johnson, Lyle Miller, Sr., Stephanie Smith, Anthony Thompkins, Warrell Watson, Charles Wetmore, II, Veva Prichard, Brad Lingerfelt, LR Rentals Real Estate, LLC, Scott Shaffer, Kimberly Marshall,

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 8 of 157

Thomas Palmer, Jr., Kimberly Jarrell, Terry Durst.

Defendants.

Plaintiff Sand Castle South Timeshare Owners Association, Inc., a South Carolina corporation ("Plaintiff" or the "Association") alleges and avers the following:

#### NATURE AND PURPOSE OF THIS ADVERSARY PROCEEDING

- 1. This adversary proceeding seeks relief to enable the sale of the condominiums which were in the Sand Castle South Timeshare Ownership Plan prior to its termination, to enable the payment of the expenses and debts incurred by Plaintiff as the association of the timeshare owners under such Plan, to prevent and/or minimize the waste and loss of the value of the subject property, and, hopefully, to provide some payment to active timeshare owners under the Plan.
- 2. To accomplish these objectives, this Complaint includes causes of action seeking (i) the partition of the property by sale; (ii) the sale of co-owned property under 11 U.S.C. § 363(h); and (iii) the setoff of the delinquent amounts owed by non-paying (as of the date of the filing of this bankruptcy case) timeshare owners to Plaintiff against the portion of the sale proceeds of the condominiums that may be otherwise attributed to them.
- 3. In this Complaint, the allegations of Jurisdiction and Venue are set forth in paragraphs 4 and 5 of the Complaint; allegations regarding Plaintiff are set forth in paragraphs 6 through 8 of the Complaint; allegations regarding the subject property, generally, are set forth in paragraph 8 (included in the allegations regarding Plaintiff) and in paragraph 9 of the Complaint; allegations regarding the Defendants are set forth in paragraphs 10 through 963 of the Complaint; general allegations supporting the causes of action are set forth in paragraphs 964 through 976 of

the Complaint; the First Cause of Action for Declaratory Judgment is alleged in paragraphs 977 through 982 of the Complaint; the Second Cause of Action for Partition is alleged in paragraphs 983 through 990 of the Complaint; and the Third Cause of Action for a sale under 11 U.S.C. § 363(h) is alleged in paragraphs 991 through 995 of the Complaint.

#### **JURISDICTION AND VENUE**

- 4. This adversary proceeding is filed under 11 U.S.C. § 541(a), 11 U.S.C. § 363(h), and Rule 7001(1), (2), (3) and (9) of the Federal Rules of Bankruptcy Procedure.
- 5. This Court has jurisdiction of this adversary proceeding pursuant to 28 U.S.C. §§ 1334 and 157(a) and Local Civil Rule 83.IX.01 (D.S.C.). This matter is a core proceeding under 28 U.S.C. § 157(b)(2)(C), (N) and (O). Venue is proper in this district pursuant to 28 U.S.C. § 1409(a).

## THE PARTIES AND THE PROPERTY

#### A. The Plaintiff

- 6. Plaintiff is a not-for-profit corporation organized and existing under the laws of the State of South Carolina and doing business in Horry County, South Carolina.
- 7. Plaintiff was created pursuant to that certain Master Deed for Sand Castle South Horizontal Property Regime filed on June 16, 2006 and recorded in Deed Book 3114 at Page 478, et seq. in the Office of the Register of Deeds for Horry County, South Carolina (as amended and supplemented, the "Master Deed"), and that certain Supplemental Declaration for the Sand Castle South Timeshare Ownership Plan filed on June 22, 2007 and recorded in Deed Book 3255 at Page 567, et seq. in the Office of the Register of Deeds for Horry County (the "Timeshare Plan Declaration"), which created an interval ownership and time sharing plan (the "Timeshare Plan") for certain designated condominiums (the "Condominiums") in the improved real property located at 2207 South Ocean Boulevard, Myrtle Beach, South Carolina, which Condominiums and

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 10 of 157

surrounding real property are more particularly described in the Master Deed and in the Timeshare Plan Declaration.

8. Plaintiff is the Association of the owners of timeshare units under the Timeshare Plan, and its membership is comprised of such owners of timeshare units under the Timeshare Plan.

# **B.** The Property

9. The Timeshare Plan includes forty (40) condominium units. The Condominiums comprise the 9<sup>th</sup> and 11<sup>th</sup> floors of the Sand Castle South building at 2207 Ocean Boulevard, Myrtle Beach, South Carolina. The Condominiums are designated as units under the Timeshare Plan corresponding to their condominium numbers in the building. For example, condominium number 901 in the building is "Unit 901" under the Timeshare Plan. The Condominiums and surrounding real property are more particularly described in the Master Deed and in the Timeshare Plan Declaration.

#### C. The Defendants

- 10. The named defendants (the "<u>Defendants</u>") are the former owners of timeshare units (each formerly a "<u>Timeshare Owner</u>" and, collectively, the "<u>Timeshare Owners</u>") and members of the Association under the Timeshare Plan. As a result of the termination of the Timeshare Plan (described herein below), the Defendants are now tenants in common (each now a "<u>Co-Owner</u>" and, collectively, the "<u>Co-Owners</u>") for their respective interests in the Condominiums.
- 11. Pursuant to the terms of the Timeshare Plan Declaration and the <u>By-Laws of Sand</u>

  <u>Castle South Timeshare Owners Association, Inc.</u> (the "<u>By-Laws</u>"), each Timeshare Owner is responsible for paying annual assessments, often referred to as a maintenance fee, as determined by the Board of Directors.

- 12. The Defendants are named in this adversary proceeding based upon their ownership interest of record in the Condominiums, previously as timeshare owners and now as tenants in common.
- 13. As of May 22, 2019, certain Co-Owners identified below were current in their obligations to the Association (such Co-Owners are referred to herein as "<u>Active Owners</u>")
- 14. As of May 22, 2019, certain Co-Owners identified below were delinquent in their obligations to the Association (such Co-Owners are referred to herein as "<u>Delinquent Owners</u>").

- 15. Upon information and belief, Defendant Jeffrey Taylor is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 16. Upon information and belief, Defendant Rosalie Martin is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 17. Upon information and belief, Defendant David McCormick, Sr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 18. Upon information and belief, Defendant James Wagner, Jr. is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 19. Upon information and belief, Defendant Morris Reid, III is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 12 of 157

- 20. Upon information and belief, Defendant Nicholas Bailey is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 21. Upon information and belief, Defendant Susan Blevins is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 22. Upon information and belief, Defendant Osvaldo Morales is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 23. Upon information and belief, Defendant Arther Roberson, Sr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 24. Upon information and belief, Defendant Kalyan Anumula is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 25. Upon information and belief, Defendant John Cindea is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 26. Upon information and belief, Defendant Robert Coffey is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 13 of 157

- 27. Upon information and belief, Defendant Felicia Foulks is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 28. Upon information and belief, Defendant Jesse Kiger, II is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 29. Upon information and belief, Defendant Daniel Bell is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 30. Upon information and belief, Defendant John Miller is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

- 31. Upon information and belief, Defendant Charles Smith is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 32. Upon information and belief, Defendant Kimberly Jordan is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 33. Upon information and belief, Defendant Rosemary Pope is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 14 of 157

- 34. Upon information and belief, Defendant Willie Dexter is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 35. Upon information and belief, Defendant Arturo Vazquez is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 36. Upon information and belief, Defendant John Guadalupe is a citizen and resident of the State of Arizona, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 37. Upon information and belief, Defendant David Schmidt is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 38. Upon information and belief, Defendant John Graves is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 39. Upon information and belief, Defendant Isaac Mclaughlin is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 40. Upon information and belief, Defendant Johnny Murray is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 15 of 157

- 41. Upon information and belief, Defendant James Danford, Jr. is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 42. Upon information and belief, Defendant Ryan England is a citizen and resident of the State of Texas, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 43. Upon information and belief, Defendant Cecil Piansay is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 44. Upon information and belief, Defendant Wayne White is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 45. Upon information and belief, Defendant Timothy Brown is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

- 46. Upon information and belief, Defendant Joyce Robinson-Bell is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 47. Upon information and belief, Defendant John Le is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 16 of 157

- 48. Upon information and belief, Defendant Linda Radcliffe is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 49. Upon information and belief, Defendant Westley Williams, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 50. Upon information and belief, Defendant Leonard Banks is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 51. Upon information and belief, Defendant Eldon Hopkins, III is a citizen and resident of the State of Massachusetts, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 52. Upon information and belief, Defendant Sanders Fairley is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 53. Upon information and belief, Defendant Susan Preston is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 54. Upon information and belief, Defendant Larry Krause is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 17 of 157

- 55. Upon information and belief, Defendant Vincent Passalacqua is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 56. Upon information and belief, Defendant Ellis Pardue is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 57. Upon information and belief, Defendant Lisa L. Williams is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 58. Upon information and belief, Defendant Elton Pierson is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 59. Upon information and belief, Defendant Darrell Hunt is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

- 60. Upon information and belief, Defendant Nick Gurick is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 61. Upon information and belief, Defendant George Moore, Jr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 18 of 157

- 62. Upon information and belief, Defendant Estate of Sandra Coombes is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 63. Upon information and belief, Defendant Mary J. O'Neal is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 64. Upon information and belief, Defendant Nelson Clayton is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 65. Upon information and belief, Defendant Michelle Hillman is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.

- 66. Upon information and belief, Defendant Michael Leininger is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 67. Upon information and belief, Defendant Grover Miller is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 68. Upon information and belief, Defendant Eloise Kiaku is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 19 of 157

- 69. Upon information and belief, Defendant Lisa Fields is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 70. Upon information and belief, Defendant Thomas Hickle is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 71. Upon information and belief, Defendant Jean Morrison is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 72. Upon information and belief, Defendant Stanley Griffin is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 73. Upon information and belief, Defendant Monte Forte is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 74. Upon information and belief, Defendant Veronica Scales is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 75. Upon information and belief, Defendant Anthony Pickhinke is a citizen and resident of the State of Arizona, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 20 of 157

76. Upon information and belief, Defendant Daniel Bell is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.

- 77. Upon information and belief, Defendant Charles Phillips is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 78. Upon information and belief, Defendant Rejimon Varghese is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 79. Upon information and belief, Defendant Timothy Sargeant is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 80. Upon information and belief, Defendant James Moore is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 81. Upon information and belief, Defendant Wesley Pursiful is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 82. Upon information and belief, Defendant Timothy Shaw is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 21 of 157

- 83. Upon information and belief, Defendant Orlando Living Trust, dated January 28, 2008, Michael E. & Christine M. Orlando, Trustees, is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 84. Upon information and belief, Defendant Warren Perkins is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.

- 85. Upon information and belief, Defendant Charles Jackson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 86. Upon information and belief, Defendant Taji Richardson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 87. Upon information and belief, Defendant Louis Blake, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 88. Upon information and belief, Defendant Jason Fields is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 89. Upon information and belief, Defendant Wanda Hall is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 22 of 157

- 90. Upon information and belief, Defendant Frank Faith is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 91. Upon information and belief, Defendant James Muzeni is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 92. Upon information and belief, Defendant Joyce Stallings is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 93. Upon information and belief, Defendant Andre Belisle is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 94. Upon information and belief, Defendant Tarrin Horne is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.

- 95. Upon information and belief, Defendant Eric Surratt is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 96. Upon information and belief, Defendant Jared Hendrick is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 23 of 157

- 97. Upon information and belief, Defendant Haughton Purser is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 98. Upon information and belief, Defendant Justin Ooten is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 99. Upon information and belief, Defendant Stewart Strothers, III is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 100. Upon information and belief, Defendant John Earnshaw is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 101. Upon information and belief, Defendant Mary Tutterow is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 102. Upon information and belief, Defendant Steven Mangus is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.

# **Active Owners of Unit 909**

103. Upon information and belief, Defendant Mary Jackson is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.

- 104. Upon information and belief, Defendant Anthony Smith is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 105. Upon information and belief, Defendant Aaron Fowler is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 106. Upon information and belief, Defendant Kevin Kube is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 107. Upon information and belief, Defendant Clair Fairbrother is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 108. Upon information and belief, Defendant Grady Harmon is a citizen and resident of the State of Alabama, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 109. Upon information and belief, Defendant Timothy Colby is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.

# **Active Owners of Unit 910**

110. Upon information and belief, Defendant Jeffrey Burdick is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 25 of 157

111. Upon information and belief, Defendant John Lockhart is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.

- 112. Upon information and belief, Defendant Jessie Leonard is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 113. Upon information and belief, Defendant Ronald Carter is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 114. Upon information and belief, Defendant Thomas Meta is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 115. Upon information and belief, Defendant Winston Clarke is a citizen and resident of a state of the United States of America, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 116. Upon information and belief, Defendant Terry McKinney is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.

# **Active Owners of Unit 911**

117. Upon information and belief, Defendant Ryan Thurman is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.

- 118. Upon information and belief, Defendant Luis Baires is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 119. Upon information and belief, Defendant Ralph Bolt is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 120. Upon information and belief, Defendant Andrew Southerland is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 121. Upon information and belief, Defendant Chester Boroski, Sr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.

- 122. Upon information and belief, Defendant Janis Ikaunieks is a citizen and resident of the State of Wisconsin, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.
- 123. Upon information and belief, Defendant Steven Durham is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.
- 124. Upon information and belief, Defendant Arleathia Beavers is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 27 of 157

- 125. Upon information and belief, Defendant Benny Graham is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 126. Upon information and belief, Defendant James Lundy is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 127. Upon information and belief, Defendant Madeline Wood is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 128. Upon information and belief, Defendant Michael Jones is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 129. Upon information and belief, Defendant Lance Taylor is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 130. Upon information and belief, Defendant Michael Tanksley is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 131. Upon information and belief, Defendant Janice Polesky is a citizen and resident of the State of Minnesota, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 28 of 157

- 132. Upon information and belief, Defendant Gary Berry is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 133. Upon information and belief, Defendant Connie Slade is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 134. Upon information and belief, Defendant Ventura Keels is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 135. Upon information and belief, Defendant James Russell is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 136. Upon information and belief, Defendant Karen Vaught is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 137. Upon information and belief, Defendant Hugh Brunner is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 138. Upon information and belief, Defendant David Shaw is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.

- 139. Upon information and belief, Defendant Charles High is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 140. Upon information and belief, Defendant Alan Templeton is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 141. Upon information and belief, Defendant Todd Lutkenhaus is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 142. Upon information and belief, Defendant Daniel Bell is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.

- 143. Upon information and belief, Defendant Benny Graham is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 144. Upon information and belief, Defendant Sue Marks is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 145. Upon information and belief, Defendant William Thomas is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.

- 146. Upon information and belief, Defendant James Lundy is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 147. Upon information and belief, Defendant Madeline Wood is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 148. Upon information and belief, Defendant Michael Jones is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 149. Upon information and belief, Defendant Lance Taylor is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 150. Upon information and belief, Defendant Michael Tanksley is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 151. Upon information and belief, Defendant Janice Polesky is a citizen and resident of the State of Minnesota, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 152. Upon information and belief, Defendant Gary Berry is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 153. Upon information and belief, Defendant Connie Slade is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 31 of 157

- 154. Upon information and belief, Defendant Ventura Keels is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 155. Upon information and belief, Defendant Michael Evola is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 156. Upon information and belief, Defendant Roy Ayers is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 157. Upon information and belief, Defendant Hugh Brunner is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 158. Upon information and belief, Defendant David Shaw is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 159. Upon information and belief, Defendant Charles High is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 160. Upon information and belief, Defendant Alan Templeton is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.

161. Upon information and belief, Defendant Daniel Bell is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.

- 162. Upon information and belief, Defendant Jocelyn Doyon is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 163. Upon information and belief, Defendant Jon-Paul Miron is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 164. Upon information and belief, Defendant Andrew Mears is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 165. Upon information and belief, Defendant Lee McLean is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 166. Upon information and belief, Defendant Alexis Bennett is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 167. Upon information and belief, Defendant Christine Kays is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 168. Upon information and belief, Defendant William Wolf is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 33 of 157

- 169. Upon information and belief, Defendant Jean Morrison is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 170. Upon information and belief, Defendant Bobby Rhodes is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 171. Upon information and belief, Defendant Christopher Crousser is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 172. Upon information and belief, Defendant Leatha Williams is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 173. Upon information and belief, Defendant Chester Boroski, Sr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 174. Upon information and belief, Defendant William Black is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 175. Upon information and belief, Defendant John Schaub is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 34 of 157

- 176. Upon information and belief, Defendant Jeffrey T. Sargent is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 177. Upon information and belief, Defendant Zereda M. Wells is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 178. Upon information and belief, Defendant Waltraud Booth is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 179. Upon information and belief, Defendant Robert Vittitoe is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 180. Upon information and belief, Defendant Beth Johnson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 181. Upon information and belief, Defendant Djani Darmanovic is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 182. Upon information and belief, Defendant James Moore is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 35 of 157

- 183. Upon information and belief, Defendant David Hanner is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 184. Upon information and belief, Defendant Harriet Durrwachter is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 185. Upon information and belief, Defendant Pearline Hutto is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 186. Upon information and belief, Defendant Clyde Caudle is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 187. Upon information and belief, Defendant Shawn Brehm is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 188. Upon information and belief, Defendant Donna McCraw is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 189. Upon information and belief, Defendant Thomas Myers is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 36 of 157

- 190. Upon information and belief, Defendant Eric Surratt is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 191. Upon information and belief, Defendant George P. Burfeind is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 192. Upon information and belief, Defendant Eduardo Tanaka is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 193. Upon information and belief, Defendant Patrick Froncek is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 194. Upon information and belief, Defendant Timothy Sargeant is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 195. Upon information and belief, Defendant Brad Caudill is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 196. Upon information and belief, Defendant Wesley Pursiful is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 37 of 157

- 197. Upon information and belief, Defendant Ann Dyjak is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 198. Upon information and belief, Defendant Joe Flowers is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 199. Upon information and belief, Defendant Matthew Dell'Orso is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 200. Upon information and belief, Defendant David Miller is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 201. Upon information and belief, Defendant Barbara Bielawski is a citizen and resident of the State of Wisconsin, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 202. Upon information and belief, Defendant Frank Tracy is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 203. Upon information and belief, Defendant Stacey Smith is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 38 of 157

- 204. Upon information and belief, Defendant Mary McIntosh is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 205. Upon information and belief, Defendant Ruben Tacas is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 206. Upon information and belief, Defendant William Addison is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 207. Upon information and belief, Defendant Clair Fairbrother is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 208. Upon information and belief, Defendant Arleathia Beavers is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 209. Upon information and belief, Defendant Amy Case is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 210. Upon information and belief, Defendant Willie Mathis is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 39 of 157

### **Active Owners of Unit 919**

- 211. Upon information and belief, Defendant David Keith is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 212. Upon information and belief, Defendant Jared Hendrick is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 213. Upon information and belief, Defendant Wieslaw Cierpka is a citizen and resident of the State of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 214. Upon information and belief, Defendant John Welborn is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 215. Upon information and belief, Defendant Thomas Hickle is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 216. Upon information and belief, Defendant Susan Noack is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 217. Upon information and belief, Defendant Anatoly Naritsin is a citizen and resident of the State of Massachusetts, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 40 of 157

- 218. Upon information and belief, Defendant Aaron Jolly is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 219. Upon information and belief, Defendant Denis Silcock is a citizen and resident of the State of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 220. Upon information and belief, Defendant Shyella Lisbon is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 221. Upon information and belief, Defendant Ronald Carter is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 222. Upon information and belief, Defendant Stanley Griffin is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 223. Upon information and belief, Defendant Kevin Kube is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 224. Upon information and belief, Defendant Terry McKinney is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.

- 225. Upon information and belief, Defendant James Lajsic is a citizen and resident of the State of Wisconsin, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 226. Upon information and belief, Defendant Leonard Gunn, Jr. is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 227. Upon information and belief, Defendant Daniel Bell is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 228. Upon information and belief, Defendant Chelsea Schrader is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.

## **Active Owners of Unit 920**

- 229. Upon information and belief, Defendant Dorothy J. Smith is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 230. Upon information and belief, Defendant Rejimon Varghese is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 231. Upon information and belief, Defendant Jimmie Blankenship, Jr. is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 42 of 157

- 232. Upon information and belief, Defendant James Jacks is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 233. Upon information and belief, Defendant Dennis Link is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 234. Upon information and belief, Defendant Thomas Chapman is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 235. Upon information and belief, Defendant Denis Silcock is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 236. Upon information and belief, Defendant Nicholas Kleifgen is a citizen and resident of the State of Wisconsin, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 237. Upon information and belief, Defendant Robert Wert, Jr. is a citizen and resident of the State of Texas, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 238. Upon information and belief, Defendant Jennifer Dagenhart is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 239. Upon information and belief, Defendant Francis Ralston is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 43 of 157

- 240. Upon information and belief, Defendant Jason Bolin is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 241. Upon information and belief, Defendant Curtis Suber is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan

### **Active Owners of Unit 921**

- 242. Upon information and belief, Defendant James Jacks is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 243. Upon information and belief, Defendant Dennis Link is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 244. Upon information and belief, Defendant Anthony Smith is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 245. Upon information and belief, Defendant Dennis Donnelly is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 246. Upon information and belief, Defendant Thomas Chapman is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 44 of 157

- 247. Upon information and belief, Defendant Robert Wert, Jr. is a citizen and resident of the State of Texas, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 248. Upon information and belief, Defendant Nelson Fowler is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 249. Upon information and belief, Defendant Anthony Breeden is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 250. Upon information and belief, Defendant Thomas Meta is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 251. Upon information and belief, Defendant Virginia Woodcock is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 252. Upon information and belief, Defendant Jennifer Dagenhart is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 253. Upon information and belief, Defendant Curtis Suber is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.

- 254. Upon information and belief, Defendant Troy Jones is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 255. Upon information and belief, Defendant Christine McCracken is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.

## **Active Owners of Unit 1101**

- 256. Upon information and belief, Defendant Phillip Shaw is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 257. Upon information and belief, Defendant Kenwick Brown is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 258. Upon information and belief, Defendant Omar Jenkins is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 259. Upon information and belief, Defendant Ronnie Bryant is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 260. Upon information and belief, Defendant Anna Viers is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 46 of 157

### **Active Owners of Unit 1103**

- 261. Upon information and belief, Defendant Lesley Lyttle is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 262. Upon information and belief, Defendant Mick Miller is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 263. Upon information and belief, Defendant Dennis Wright is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 264. Upon information and belief, Defendant Kimberly Miller is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 265. Upon information and belief, Defendant James McKenna is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 266. Upon information and belief, Defendant Kim McLaughlin is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 267. Upon information and belief, Defendant James Martin a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 47 of 157

- 268. Upon information and belief, Defendant Donna Drennen is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 269. Upon information and belief, Defendant Judith Cripe is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 270. Upon information and belief, Defendant William Blackwell is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 271. Upon information and belief, Defendant Robert Torrisi is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 272. Upon information and belief, Defendant Joshua Ford is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 273. Upon information and belief, Defendant Douglas Young is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 274. Upon information and belief, Defendant John Cortina is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.

- 275. Upon information and belief, Defendant Rich Evans is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 276. Upon information and belief, Defendant Andrew Pfefferkorn, Jr. is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.

### **Active Owners of Unit 1104**

277. Upon information and belief, Defendant Levente Berry is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1104 in the Timeshare Plan.

## **Active Owners of Unit 1106**

278. Upon information and belief, Defendant Pamela Helton is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1106 in the Timeshare Plan.

#### **Active Owners of Unit 1110**

279. Upon information and belief, Defendant Joseph Reinhardt, is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1110 in the Timeshare Plan.

## **Active Owners of Unit 1114**

280. Upon information and belief, Defendant Kenneth Watson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 49 of 157

- 281. Upon information and belief, Defendant James Baltzell is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 282. Upon information and belief, Defendant Victor Diaz, III is a citizen and resident of the State of Texas, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 283. Upon information and belief, Defendant Stephen Harvilla is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 284. Upon information and belief, Defendant Ojoma Edeh Herr is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 285. Upon information and belief, Defendant Albert Walker is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 286. Upon information and belief, Defendant Michael Lyons is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 287. Upon information and belief, Defendant Gregory Dykes is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 50 of 157

- 288. Upon information and belief, Defendant Michael Means is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 289. Upon information and belief, Defendant Mark Pennington is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 290. Upon information and belief, Defendant Gregory Tackett is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 291. Upon information and belief, Defendant Tina Gerbino is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 292. Upon information and belief, Defendant Michael Coats is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 293. Upon information and belief, Defendant Layden Wilson is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 294. Upon information and belief, Defendant Donna Clark is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.

- 295. Upon information and belief, Defendant Larry Hatley is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 296. Upon information and belief, Defendant Daniel Fett is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 297. Upon information and belief, Defendant John Zimmerman is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 298. Upon information and belief, Defendant Christopher Edwards is a citizen and resident of the State of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 299. Upon information and belief, Defendant John Mulder is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 300. Upon information and belief, Defendant Gerry Wilson is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.

## **Active Owners of Unit 1115**

301. Upon information and belief, Defendant Kenneth Watson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 52 of 157

- 302. Upon information and belief, Defendant Thomas Whalen is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 303. Upon information and belief, Defendant James Baltzell is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 304. Upon information and belief, Defendant Ojoma Edeh Herr is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 305. Upon information and belief, Defendant Albert Walker is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 306. Upon information and belief, Defendant Mark Pennington is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 307. Upon information and belief, Defendant Tina Gerbino is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 308. Upon information and belief, Defendant Larry Hatley is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 53 of 157

- 309. Upon information and belief, Defendant John Zimmerman is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 310. Upon information and belief, Defendant Christopher Edwards is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 311. Upon information and belief, Defendant John Mulder is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 312. Upon information and belief, Defendant Gerry Wilson is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 313. Upon information and belief, Defendant Jane Sander is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 314. Upon information and belief, Defendant Charles Compton, Jr. is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 315. Upon information and belief, Defendant James Phillips, III is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 54 of 157

## **Active Owners of Unit 1116**

- 316. Upon information and belief, Defendant Frank Hawkins is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 317. Upon information and belief, Defendant Robert Campbell, Jr. is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 318. Upon information and belief, Defendant Gordon Smith is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 319. Upon information and belief, Defendant John Harkness is a citizen and resident of the State of Michigan, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 320. Upon information and belief, Defendant Charles Henkey is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 321. Upon information and belief, Defendant David Collins, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 322. Upon information and belief, Defendant Andrea Phillips is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 55 of 157

- 323. Upon information and belief, Defendant David Price is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 324. Upon information and belief, Defendant Larry Lee, Jr. is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 325. Upon information and belief, Defendant Ralph Casto is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 326. Upon information and belief, Defendant Jerry Gee, III is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 327. Upon information and belief, Defendant Jennifer Nixon is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.

## **Active Owners of Unit 1117**

- 328. Upon information and belief, Defendant Morgan Lane is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.
- 329. Upon information and belief, Defendant Jacquelyne Holman is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.

- 330. Upon information and belief, Defendant Rodney Brunson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.
- 331. Upon information and belief, Defendant Kyleen Oxendine is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.

### **Active Owners of Unit 1120**

332. Upon information and belief, Defendant Joshua Shirley is a citizen and resident of the State of Texas, is neither an infant nor incompetent and is a Co-Owner of Unit 1120 in the Timeshare Plan.

## **Active Owners of Unit 1121**

- 333. Upon information and belief, Defendant Jennifer Young is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 1121 in the Timeshare Plan.
- 334. Upon information and belief, Defendant William Griffith is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1121 in the Timeshare Plan.

#### **Delinquent Owners of Unit 901**

335. Upon information and belief, Defendant John Spears is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 57 of 157

- 336. Upon information and belief, Defendant Norman Bogard is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 337. Upon information and belief, Defendant Cynthia Billington is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 338. Upon information and belief, Defendant Myron Ravenel is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 339. Upon information and belief, Defendant Johnny Crawford is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 340. Upon information and belief, Defendant Robert Demarest, Jr. is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 341. Upon information and belief, Defendant Daniel Elyard is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 342. Upon information and belief, Defendant Melissa Latoria Hairston is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 58 of 157

- 343. Upon information and belief, Defendant Ronald Knipp is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 344. Upon information and belief, Defendant Rogelio Lynch is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 345. Upon information and belief, Defendant Craig Treece is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 346. Upon information and belief, Defendant Ruben Vasquez is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 347. Upon information and belief, Defendant Charles Witherspoon, Jr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 348. Upon information and belief, Defendant David Miller is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 349. Upon information and belief, Defendant George Dry, IV is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 59 of 157

- 350. Upon information and belief, Defendant Jerome Hardy is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 351. Upon information and belief, Defendant L. Noblett is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 352. Upon information and belief, Defendant Lawrence Stuckey, III is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 353. Upon information and belief, Defendant Robert Walton is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 354. Upon information and belief, Defendant Dutch Reuschel is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 355. Upon information and belief, Defendant Jon Sarlea is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 356. Upon information and belief, Defendant Robert Joyner, Jr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 60 of 157

- 357. Upon information and belief, Defendant Monique Gregory is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 358. Upon information and belief, Defendant Keith Williams is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 359. Upon information and belief, Defendant Randall Mueckl is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 360. Upon information and belief, Defendant Ronald Tharp is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 361. Upon information and belief, Defendant Clifton Turner is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 362. Upon information and belief, Defendant Dante Palmer, Sr. is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 363. Upon information and belief, Defendant Nikkie Evans is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 61 of 157

- 364. Upon information and belief, Defendant Daniel Lambo, Jr is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 365. Upon information and belief, Defendant Edward Brown is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 366. Upon information and belief, Defendant Nicole Bubb is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 367. Upon information and belief, Defendant Georgia Rhodes is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 368. Upon information and belief, Defendant Evelyn Gaddy is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 369. Upon information and belief, Defendant Kathryn Rogers is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 370. Upon information and belief, Defendant Stanley Gales is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

- 371. Upon information and belief, Defendant C and S Resort Getaway, LLC is headquartered and/or does business in the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 372. Upon information and belief, Defendant Meoshi Manns is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 373. Upon information and belief, Defendant Petrus Vacation Rentals, LLC is headquartered and/or does business in the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 374. Upon information and belief, Defendant Glennis McElveen is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.
- 375. Upon information and belief, Defendant Carlos Reynolds is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 901 in the Timeshare Plan.

# **Delinquent Owners of Unit 902**

- 376. Upon information and belief, Defendant Russell Runion is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 377. Upon information and belief, Defendant Ricquel Pratt is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 63 of 157

- 378. Upon information and belief, Defendant Bryan Barber is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 379. Upon information and belief, Defendant Dara Cohen is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 380. Upon information and belief, Defendant Randy Findley is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 381. Upon information and belief, Defendant John Groce, Jr is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 382. Upon information and belief, Defendant Alfred Saylor is a citizen and resident of the State of Michigan, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 383. Upon information and belief, Defendant David Stewart is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 384. Upon information and belief, Defendant Gregory Kranefuss is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 64 of 157

- 385. Upon information and belief, Defendant Adelbert Cobbin is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 386. Upon information and belief, Defendant Robert Crum is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 387. Upon information and belief, Defendant Lisa Hargraves is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 388. Upon information and belief, Defendant Harrison Shell is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 389. Upon information and belief, Defendant Chet West is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 390. Upon information and belief, Defendant Shirley Ballard is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 391. Upon information and belief, Defendant Karen Daniel is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 65 of 157

- 392. Upon information and belief, Defendant Allen Garner is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 393. Upon information and belief, Defendant Anthony Hodges is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 394. Upon information and belief, Defendant Michael Jones is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 395. Upon information and belief, Defendant Phil Kesterson, Sr. is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 396. Upon information and belief, Defendant James Long is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 397. Upon information and belief, Defendant Charles Patrick is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 398. Upon information and belief, Defendant Sue Taylor is a citizen and resident of the State of Delaware, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 66 of 157

- 399. Upon information and belief, Defendant Reamus Williams is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 400. Upon information and belief, Defendant Angele Wright is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 401. Upon information and belief, Defendant Patrick Lockhart is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 402. Upon information and belief, Defendant Geovonda Martin is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 403. Upon information and belief, Defendant Wanda Johnson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 404. Upon information and belief, Defendant Grantham McNeill is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 405. Upon information and belief, Defendant Jae Adle is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 67 of 157

- 406. Upon information and belief, Defendant Kenneth Kimber is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 407. Upon information and belief, Defendant Melvin Dixon is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 408. Upon information and belief, Defendant Connie Mauldin is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 409. Upon information and belief, Defendant Sharron Smith is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 410. Upon information and belief, Defendant Bernadine Sampson is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 411. Upon information and belief, Defendant Randy Patterson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 412. Upon information and belief, Defendant Thomas G. Carslay is a citizen and resident of the State of Arizona, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

- 413. Upon information and belief, Defendant Morgan Mills is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 414. Upon information and belief, Defendant Rodridgus Jones is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.
- 415. Upon information and belief, Defendant Stephanie Smith is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 902 in the Timeshare Plan.

## **Delinquent Owners of Unit 903**

- 416. Upon information and belief, Defendant Christen Frye is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 417. Upon information and belief, Defendant Chad Shealy is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 418. Upon information and belief, Defendant Robert Craig, Jr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 419. Upon information and belief, Defendant Sherry Williams Gee is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 69 of 157

- 420. Upon information and belief, Defendant Lisa Kurowski is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 421. Upon information and belief, Defendant Germari Sharper is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 422. Upon information and belief, Defendant Elizabeth Hawks is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 423. Upon information and belief, Defendant David Keith is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 424. Upon information and belief, Defendant Robert Vaughan is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 425. Upon information and belief, Defendant Christopher Bennett is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 426. Upon information and belief, Defendant Tomesha Crowder is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 70 of 157

- 427. Upon information and belief, Defendant Gregory Henderson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 428. Upon information and belief, Defendant Brenda Key is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 429. Upon information and belief, Defendant Billie Locklear is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 430. Upon information and belief, Defendant Savonita Peeler is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 431. Upon information and belief, Defendant Jabez Powell is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 432. Upon information and belief, Defendant Willie Preston is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 433. Upon information and belief, Defendant Sherman Wallace, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 71 of 157

- 434. Upon information and belief, Defendant Jeri Brannen is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 435. Upon information and belief, Defendant H. Brooks is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 436. Upon information and belief, Defendant Christopher Gordon is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 437. Upon information and belief, Defendant Joseph McJunkins is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 438. Upon information and belief, Defendant Frederick Rhew is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 439. Upon information and belief, Defendant Buddy Thompson, Sr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 440. Upon information and belief, Defendant Nancy Vazquez is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 72 of 157

- 441. Upon information and belief, Defendant Dallas Waters is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 442. Upon information and belief, Defendant James Adams is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 443. Upon information and belief, Defendant Jonathon Schlax is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 444. Upon information and belief, Defendant Marcia Ragin is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 445. Upon information and belief, Defendant Richard Edwards is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 446. Upon information and belief, Defendant Jimmy Reum, Jr. is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 447. Upon information and belief, Defendant Benjie Keith is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 73 of 157

- 448. Upon information and belief, Defendant James Wilson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 449. Upon information and belief, Defendant Melondy Jones is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 450. Upon information and belief, Defendant Ted Gean is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 451. Upon information and belief, Defendant Gloria Draughon is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 452. Upon information and belief, Defendant Pamela Allen is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 453. Upon information and belief, Defendant Wayne Montague is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 454. Upon information and belief, Defendant Ronald Dobbins is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

- 455. Upon information and belief, Defendant Cheryl Ann Black is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.
- 456. Upon information and belief, Defendant Albert L. Campbell is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 903 in the Timeshare Plan.

- 457. Upon information and belief, Defendant Edwin Smith is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 458. Upon information and belief, Defendant Daniel Harris is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 459. Upon information and belief, Defendant Robbie Atkins is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 460. Upon information and belief, Defendant Erica Renee Beckett is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 461. Upon information and belief, Defendant Maurice Walker, Sr. is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 75 of 157

- 462. Upon information and belief, Defendant Robert Beatty is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 463. Upon information and belief, Defendant Charles Evans is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 464. Upon information and belief, Defendant Fallon Hill is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 465. Upon information and belief, Defendant George Kirby is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 466. Upon information and belief, Defendant Catherine Monte is a citizen and resident of the State of Michigan, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 467. Upon information and belief, Defendant Eric Scott is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 468. Upon information and belief, Defendant Major NewKirk is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 76 of 157

- 469. Upon information and belief, Defendant Guy Robbs is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 470. Upon information and belief, Defendant Charles Sparwasser is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 471. Upon information and belief, Defendant Thomas Tricka is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 472. Upon information and belief, Defendant Sandra Cooper is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 473. Upon information and belief, Defendant James Treadaway is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 474. Upon information and belief, Defendant Joshua Conerly is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 475. Upon information and belief, Defendant James Lynd is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 77 of 157

- 476. Upon information and belief, Defendant Michael Ammons is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 477. Upon information and belief, Defendant Kevin Hammond is a citizen and resident of the State of Louisiana, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 478. Upon information and belief, Defendant Lisa Boykin is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 479. Upon information and belief, Defendant Ricky Lyons is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 480. Upon information and belief, Defendant Christopher Snider is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 481. Upon information and belief, Defendant Jana Dew is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 482. Upon information and belief, Defendant Bryan Manion is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 78 of 157

- 483. Upon information and belief, Defendant Daniel Root is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 484. Upon information and belief, Defendant Ashley Steen is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 485. Upon information and belief, Defendant O'Towers Wholesale LLC is headquartered and/or does business in the State of Washington, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 486. Upon information and belief, Defendant Joseph Wright, Sr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 487. Upon information and belief, Defendant L. Norton Pope is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 488. Upon information and belief, Defendant Anthony Thompkins is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.
- 489. Upon information and belief, Defendant Thomas Palmer, Jr. is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 904 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 79 of 157

- 490. Upon information and belief, Defendant David Cox is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 491. Upon information and belief, Defendant Paul Beeson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 492. Upon information and belief, Defendant Dennis D. Tucholski is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 493. Upon information and belief, Defendant James E. Sutton is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 494. Upon information and belief, Defendant Robert Woods is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 495. Upon information and belief, Defendant Johnston Murray is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 496. Upon information and belief, Defendant Hugh Whitley is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 80 of 157

- 497. Upon information and belief, Defendant Douglas L Williamson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 498. Upon information and belief, Defendant John Williford is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 499. Upon information and belief, Defendant Richard Berry is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 500. Upon information and belief, Defendant Lateasha Harris is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 501. Upon information and belief, Defendant Christine M. Hodges is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 502. Upon information and belief, Defendant Darren Lewis is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 503. Upon information and belief, Defendant Terry Muth is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 81 of 157

- 504. Upon information and belief, Defendant John Lawson, Sr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 505. Upon information and belief, Defendant Sheila Pierce is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 506. Upon information and belief, Defendant Allison Patrick is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 507. Upon information and belief, Defendant Debra Taylor is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 508. Upon information and belief, Defendant Marvin Kemmerer is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 509. Upon information and belief, Defendant Gregory Lane is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 510. Upon information and belief, Defendant Gary Jones is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 82 of 157

- 511. Upon information and belief, Defendant Jessica Fuller is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 512. Upon information and belief, Defendant James Myers is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 513. Upon information and belief, Defendant Roy Ellison is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 514. Upon information and belief, Defendant Michael Hudson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 515. Upon information and belief, Defendant Kimberly Murrell is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 516. Upon information and belief, Defendant John McCauley is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 517. Upon information and belief, Defendant Jacqueline Green is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 83 of 157

- 518. Upon information and belief, Defendant Marian Stepniewski is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 519. Upon information and belief, Defendant Christopher Wilcken is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 520. Upon information and belief, Defendant Elton Ross is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 521. Upon information and belief, Defendant Brian M. Buch is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 522. Upon information and belief, Defendant Warrell Watson is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 523. Upon information and belief, Defendant Brad Lingerfelt is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.
- 524. Upon information and belief, Defendant Letitia Leonard is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 905 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 84 of 157

- 525. Upon information and belief, Defendant Tracy Bodkin is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 526. Upon information and belief, Defendant Christy Garrett is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 527. Upon information and belief, Defendant Cameron Wesley Sr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 528. Upon information and belief, Defendant Je'Renia Foster is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 529. Upon information and belief, Defendant James Gaulding is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 530. Upon information and belief, Defendant Larry Neal is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 531. Upon information and belief, Defendant Christopher Pridmore is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 85 of 157

- 532. Upon information and belief, Defendant John Kohn is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 533. Upon information and belief, Defendant Dorothy Hurst is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 534. Upon information and belief, Defendant Brad Caudill is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 535. Upon information and belief, Defendant Charles Isaac is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 536. Upon information and belief, Defendant David Foltz is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 537. Upon information and belief, Defendant Graham Davis, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 538. Upon information and belief, Defendant Dwayne Simmons is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 86 of 157

- 539. Upon information and belief, Defendant Laura Dyal is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 540. Upon information and belief, Defendant Jessica Short is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 541. Upon information and belief, Defendant Billy Lockhart, Jr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 542. Upon information and belief, Defendant Nakesha Walton is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 543. Upon information and belief, Defendant Kiwanna Chapman is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 544. Upon information and belief, Defendant Jerry Uadiski is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 545. Upon information and belief, Defendant Isaac Bacoat is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 87 of 157

- 546. Upon information and belief, Defendant Amy Gage is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 547. Upon information and belief, Defendant Jeffery Story is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 548. Upon information and belief, Defendant Annette Moosavi is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 549. Upon information and belief, Defendant Kenneth Walker is a citizen and resident of the State of Michigan, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 550. Upon information and belief, Defendant Allen Jackson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 551. Upon information and belief, Defendant Durland Mosher, II is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 552. Upon information and belief, Defendant Robert Bronson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.

- 553. Upon information and belief, Defendant Richard Lewis is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 554. Upon information and belief, Defendant Crystal Eddy is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 555. Upon information and belief, Defendant Linda Atkinson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 556. Upon information and belief, Defendant Samantha Cooley is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 557. Upon information and belief, Defendant Stephen Coyle is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.
- 558. Upon information and belief, Defendant Veva Prichard is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 906 in the Timeshare Plan.

#### **Delinquent Owners of Unit 907**

559. Upon information and belief, Defendant Barbara Clark is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 89 of 157

- 560. Upon information and belief, Defendant Howard Norton is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 561. Upon information and belief, Defendant Rex Uhl is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 562. Upon information and belief, Defendant Richard Bowling is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 563. Upon information and belief, Defendant Sanford Jones is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 564. Upon information and belief, Defendant Tiffany Marrow is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 565. Upon information and belief, Defendant Nicky J. Smyre is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 566. Upon information and belief, Defendant Kenneth Robertson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 90 of 157

- 567. Upon information and belief, Defendant Robert Solomon, Jr. is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 568. Upon information and belief, Defendant Jonathan Merritt is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 569. Upon information and belief, Defendant James Corbin is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 570. Upon information and belief, Defendant Joshua Adams is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 571. Upon information and belief, Defendant Devonue Hinson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 572. Upon information and belief, Defendant Nannie Burton is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 573. Upon information and belief, Defendant Murrine Parra is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.

- 574. Upon information and belief, Defendant Derrick Greene is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 575. Upon information and belief, Defendant Belinda Deline is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 576. Upon information and belief, Defendant Kismith James is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 577. Upon information and belief, Defendant Howard Anderson is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.
- 578. Upon information and belief, Defendant Lyle Miller, Sr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 907 in the Timeshare Plan.

- 579. Upon information and belief, Defendant Zakiya Y. Bakari-Griffin is a citizen and resident of the State of Delaware, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 580. Upon information and belief, Defendant Larry Atkinson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 92 of 157

- 581. Upon information and belief, Defendant Joseph Ratliff is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 582. Upon information and belief, Defendant Darrien S. Tutt is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 583. Upon information and belief, Defendant Maria Tressler is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 584. Upon information and belief, Defendant Paul Finch is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 585. Upon information and belief, Defendant Danny Bryant is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 586. Upon information and belief, Defendant Tyronza Wesley is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 587. Upon information and belief, Defendant Cherlyn Nzongola is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 93 of 157

- 588. Upon information and belief, Defendant Calvin Fleming is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 589. Upon information and belief, Defendant Shawn Cole is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 590. Upon information and belief, Defendant Diane Artis is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 591. Upon information and belief, Defendant James Morgan is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 592. Upon information and belief, Defendant Walter Stokes is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 593. Upon information and belief, Defendant Michael Rubino is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 594. Upon information and belief, Defendant Christine Haynes is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 94 of 157

- 595. Upon information and belief, Defendant Jeffrey Mooney is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 596. Upon information and belief, Defendant Christopher Roach is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 597. Upon information and belief, Defendant Earnest Turner is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 598. Upon information and belief, Defendant James Hill is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 599. Upon information and belief, Defendant Segee Holley is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 600. Upon information and belief, Defendant Donald Key is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.
- 601. Upon information and belief, Defendant James Hunter is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 95 of 157

602. Upon information and belief, Defendant Club Resorts is headquartered and/or does business in the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 908 in the Timeshare Plan.

- 603. Upon information and belief, Defendant Calvin Lester is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 604. Upon information and belief, Defendant Elvis Johnson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 605. Upon information and belief, Defendant Jerry Carter is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 606. Upon information and belief, Defendant W. Louis McDonald is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 607. Upon information and belief, Defendant Earl Thompson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 608. Upon information and belief, Defendant Aaron Lambert is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 96 of 157

- 609. Upon information and belief, Defendant Carla Smith is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 610. Upon information and belief, Defendant Deborah Tolles is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 611. Upon information and belief, Defendant Herman Eagle is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 612. Upon information and belief, Defendant L. Kocher is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 613. Upon information and belief, Defendant James Respus is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 614. Upon information and belief, Defendant Kenneth Smith is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 615. Upon information and belief, Defendant Rex Delph is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.

- 616. Upon information and belief, Defendant Billy Fife, Jr. is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 617. Upon information and belief, Defendant Samuel Adams is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 618. Upon information and belief, Defendant Paul Mier is a citizen and resident of the State of Colorado, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.
- 619. Upon information and belief, Defendant Crystal Eddy is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 909 in the Timeshare Plan.

- 620. Upon information and belief, Defendant Dorcas Delgado is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 621. Upon information and belief, Defendant Anthony Saunders is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 622. Upon information and belief, Defendant Richard Henry is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 98 of 157

- 623. Upon information and belief, Defendant Susan Griffin is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 624. Upon information and belief, Defendant Patrick Daugherty is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 625. Upon information and belief, Defendant Delphine Ferguson is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 626. Upon information and belief, Defendant Brian Shelley is a citizen and resident of the State of Kentucky, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 627. Upon information and belief, Defendant Bertram Henry is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 628. Upon information and belief, Defendant Tammy Bennett is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 629. Upon information and belief, Defendant Ronald Hunter is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.

- 630. Upon information and belief, Defendant Steven Baldwin is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 631. Upon information and belief, Defendant Sandra Utria is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 632. Upon information and belief, Defendant Timothy Hairston is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.
- 633. Upon information and belief, Defendant Nicole Petrus is a citizen and resident of the State of Delaware, is neither an infant nor incompetent and is a Co-Owner of Unit 910 in the Timeshare Plan.

- 634. Upon information and belief, Defendant Barbi Dillard is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 635. Upon information and belief, Defendant Sheila Edwards is a citizen and resident of the State of Colorado, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 636. Upon information and belief, Defendant Kendell Thomas is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 100 of 157

- 637. Upon information and belief, Defendant Terrence Mooney is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 638. Upon information and belief, Defendant Laura Richards is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 639. Upon information and belief, Defendant Angel Fairley is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 640. Upon information and belief, Defendant Almond Davis is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 641. Upon information and belief, Defendant Terry Helms is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.
- 642. Upon information and belief, Defendant Felicia Lawrence is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 911 in the Timeshare Plan.

#### **Delinquent Owners of Unit 912**

643. Upon information and belief, Defendant Theresa Moore is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 101 of 157

- 644. Upon information and belief, Defendant Tammy Baker is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.
- 645. Upon information and belief, Defendant Gary Casterline, Jr. is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.
- 646. Upon information and belief, Defendant Brian McCann is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.
- 647. Upon information and belief, Defendant Charles George is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.
- 648. Upon information and belief, Defendant Spencer Boose is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.
- 649. Upon information and belief, Defendant Charles Wagner is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.
- 650. Upon information and belief, Defendant Ernest Harris is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 912 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 102 of 157

- 651. Upon information and belief, Defendant Michael Wolf is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 652. Upon information and belief, Defendant Henry Smoke, III is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 653. Upon information and belief, Defendant Shane Hewitt is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 654. Upon information and belief, Defendant Derek Manns is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 655. Upon information and belief, Defendant Yolanda Leon Camacho is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 656. Upon information and belief, Defendant Alice Johnson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 657. Upon information and belief, Defendant Arnold Wilkerson is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 103 of 157

- 658. Upon information and belief, Defendant Todd Lowe is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 659. Upon information and belief, Defendant Larry Mustain is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 660. Upon information and belief, Defendant Kenny Patterson is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 661. Upon information and belief, Defendant Latoya Blair is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 662. Upon information and belief, Defendant Kimberly Magruder is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 663. Upon information and belief, Defendant Lance Heasley is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 664. Upon information and belief, Defendant Adam Merrell is a citizen and resident of the State of Nebraska, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 104 of 157

- 665. Upon information and belief, Defendant Christopher Daniels is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 666. Upon information and belief, Defendant Sam Atkins, Jr. is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 667. Upon information and belief, Defendant Lillian Sydenstricker is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 668. Upon information and belief, Defendant William Callahan is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 669. Upon information and belief, Defendant Terrace Solomon is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 670. Upon information and belief, Defendant Michael Lynch is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.
- 671. Upon information and belief, Defendant Rodney A. Mason is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 105 of 157

672. Upon information and belief, Defendant Albert Schaefer is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 914 in the Timeshare Plan.

- 673. Upon information and belief, Defendant Michael Wolf is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 674. Upon information and belief, Defendant Henry Smoke, III is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 675. Upon information and belief, Defendant Shane Edwin is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 676. Upon information and belief, Defendant Derek Manns is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 677. Upon information and belief, Defendant Edward J. Bucia is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 678. Upon information and belief, Defendant Yolanda Leon Camacho is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 106 of 157

- 679. Upon information and belief, Defendant Alice Johnson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 680. Upon information and belief, Defendant Robert W. Lena is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 681. Upon information and belief, Defendant Steven Lowder is a citizen and resident of the State of Arizona, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 682. Upon information and belief, Defendant Vernell Cherry is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 683. Upon information and belief, Defendant Larry Mustain is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 684. Upon information and belief, Defendant Kenny Patterson is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 685. Upon information and belief, Defendant Latoya Blair is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 107 of 157

- 686. Upon information and belief, Defendant Kimberly Magruder is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 687. Upon information and belief, Defendant Lance Heasley is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 688. Upon information and belief, Defendant Adam Merrell is a citizen and resident of the State of Nebraska, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 689. Upon information and belief, Defendant Christopher Daniels is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 690. Upon information and belief, Defendant Sam Atkins, Jr. is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 691. Upon information and belief, Defendant Bobbie Owens is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 692. Upon information and belief, Defendant Lillian Sydenstricker is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 108 of 157

- 693. Upon information and belief, Defendant Terrace Solomon is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 694. Upon information and belief, Defendant Charles Wagner is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 695. Upon information and belief, Defendant Jimmy Moore is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 696. Upon information and belief, Defendant Patricia Canton is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 697. Upon information and belief, Defendant Michael Lynch is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.
- 698. Upon information and belief, Defendant Terry Durst is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 915 in the Timeshare Plan.

### **Delinquent Owners of Unit 916**

699. Upon information and belief, Defendant Katie Campbell is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 109 of 157

- 700. Upon information and belief, Defendant Eric Rivera is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 701. Upon information and belief, Defendant Cynthia Holder is a citizen and resident of the State of Massachusetts, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 702. Upon information and belief, Defendant Laymon Pickle is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 703. Upon information and belief, Defendant Steven Smith is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 704. Upon information and belief, Defendant John Howell is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 705. Upon information and belief, Defendant Ronald Tharp is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 706. Upon information and belief, Defendant Jeffrey Anderson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 110 of 157

- 707. Upon information and belief, Defendant Rodney White is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 708. Upon information and belief, Defendant Suzanne Ellers is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 709. Upon information and belief, Defendant Ronnie Crimes, Sr. is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 710. Upon information and belief, Defendant John Johnson is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 711. Upon information and belief, Defendant Margaret Steed is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 712. Upon information and belief, Defendant Glenda Monroe is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 713. Upon information and belief, Defendant Richard Ranson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 111 of 157

- 714. Upon information and belief, Defendant Stacey Trotman is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 715. Upon information and belief, Defendant Raoul Chasse is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 716. Upon information and belief, Defendant David Moorman, Jr. is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 717. Upon information and belief, Defendant Connie Barrington is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 718. Upon information and belief, Defendant Keith Lowery is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 719. Upon information and belief, Defendant Howard Pelton, III is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 720. Upon information and belief, Defendant Joseph Teague is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 112 of 157

- 721. Upon information and belief, Defendant Vivian Patrick is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 722. Upon information and belief, Defendant Robert Wiggins is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 723. Upon information and belief, Defendant Alvin Cooper is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 724. Upon information and belief, Defendant Sokpheak Doeung is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 725. Upon information and belief, Defendant Kenneth Person is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 726. Upon information and belief, Defendant Mark Porter is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 727. Upon information and belief, Defendant Shonda King is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 113 of 157

- 728. Upon information and belief, Defendant Walter Stokes is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 729. Upon information and belief, Defendant Michael Russo is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 730. Upon information and belief, Defendant Natalie Pitman is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 731. Upon information and belief, Defendant Christopher Roach is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 732. Upon information and belief, Defendant Kevin McCray is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 733. Upon information and belief, Defendant Robert Craig is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 734. Upon information and belief, Defendant Adam Thompson is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.

- 735. Upon information and belief, Defendant Geoffrey Rhodes is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 736. Upon information and belief, Defendant Carlette Priester is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.
- 737. Upon information and belief, Defendant Angel Onwardo, LLC is headquartered and/or does business in the State of Wisconsin, is neither an infant nor incompetent and is a Co-Owner of Unit 916 in the Timeshare Plan.

- 738. Upon information and belief, Defendant Patrick Landry is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 739. Upon information and belief, Defendant Theresa Moore is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 740. Upon information and belief, Defendant Kenneth Conley is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 741. Upon information and belief, Defendant Gary Jones is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 115 of 157

- 742. Upon information and belief, Defendant Charles Isaac is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 743. Upon information and belief, Defendant Joyce Hoffman is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 744. Upon information and belief, Defendant Jerry Jackson, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 745. Upon information and belief, Defendant Earl Thompson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 746. Upon information and belief, Defendant Vernon Allison is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 747. Upon information and belief, Defendant Dorothy Miller is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 748. Upon information and belief, Defendant Yushanda Felder is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 116 of 157

- 749. Upon information and belief, Defendant Kenneth Smith is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 750. Upon information and belief, Defendant James Clontz is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 751. Upon information and belief, Defendant William Slaughter is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 752. Upon information and belief, Defendant Katrina Robinson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 753. Upon information and belief, Defendant Norman Deal is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 754. Upon information and belief, Defendant Jesse Leake, Jr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 755. Upon information and belief, Defendant Neil Hedden is a citizen and resident of the State of Louisiana, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.

- 756. Upon information and belief, Defendant Michael Masotto is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 757. Upon information and belief, Defendant Rodney A. Mason is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 758. Upon information and belief, Defendant Burchfield Vacation Rentals, LLC is headquartered and/or does business in the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 759. Upon information and belief, Defendant Joyce Clark is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.
- 760. Upon information and belief, Defendant Charles Wetmore, II is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 917 in the Timeshare Plan.

- 761. Upon information and belief, Defendant Paul Beeson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 762. Upon information and belief, Defendant Chad G. Ramsey is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 118 of 157

- 763. Upon information and belief, Defendant Kenneth Conley is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 764. Upon information and belief, Defendant Dwayne Simmons is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 765. Upon information and belief, Defendant David Kinney is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 766. Upon information and belief, Defendant James Farris is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 767. Upon information and belief, Defendant Juanita Miles is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 768. Upon information and belief, Defendant Nicholas Richer is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 769. Upon information and belief, Defendant Charla Roby is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 119 of 157

- 770. Upon information and belief, Defendant Sandra Mosher is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 771. Upon information and belief, Defendant Kimberly Eaton is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 772. Upon information and belief, Defendant E. Dusin is a citizen and resident of the State of Kansas, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 773. Upon information and belief, Defendant Anthony Pompey is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 774. Upon information and belief, Defendant Robert Carroll is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 775. Upon information and belief, Defendant Shelly Mercer-Jamison is a citizen and resident of the State of Connecticut, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 776. Upon information and belief, Defendant William Slaughter is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 120 of 157

- 777. Upon information and belief, Defendant Michael Rubino is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 778. Upon information and belief, Defendant Kenneth Elmore is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 779. Upon information and belief, Defendant Richard Bailey Jr. is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 780. Upon information and belief, Defendant Henry Yeldell is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 781. Upon information and belief, Defendant Shaunita Marshall is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 782. Upon information and belief, Defendant ETT, LLC is headquartered and/or does business in the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.
- 783. Upon information and belief, Defendant Veva Prichard is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 121 of 157

784. Upon information and belief, Defendant Lisa L. Williams is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 918 in the Timeshare Plan.

- 785. Upon information and belief, Defendant Arnold Wilkerson is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 786. Upon information and belief, Defendant Lynn McAdams is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 787. Upon information and belief, Defendant Joshua Adams is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 788. Upon information and belief, Defendant Devonue Hinson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 789. Upon information and belief, Defendant Gary Hall is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 790. Upon information and belief, Defendant Nannie Burton is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 122 of 157

- 791. Upon information and belief, Defendant Davey Sanderson is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 792. Upon information and belief, Defendant Kimberly Eaton is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 793. Upon information and belief, Defendant Tara Hawthorne is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 794. Upon information and belief, Defendant Billy Joe Parrish is a citizen and resident of a state of the United States of America, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 795. Upon information and belief, Defendant Edward Zywczok is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 796. Upon information and belief, Defendant Lonnie Oakley, Jr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 797. Upon information and belief, Defendant E. Dusin is a citizen and resident of the State of Kansas, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 123 of 157

- 798. Upon information and belief, Defendant Bronna Poole is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 799. Upon information and belief, Defendant Michael Madison is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 800. Upon information and belief, Defendant Richard Bailey Jr. is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 801. Upon information and belief, Defendant ETT, LLC is headquartered and/or does business in the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 802. Upon information and belief, Defendant Albert Schaefer is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 803. Upon information and belief, Defendant Brad Lingerfelt is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.
- 804. Upon information and belief, Defendant Scott Shaffer is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 124 of 157

805. Upon information and belief, Defendant Kimberly Jarrell is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 919 in the Timeshare Plan.

- 806. Upon information and belief, Defendant Ted Furr, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 807. Upon information and belief, Defendant Jerry Carter is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 808. Upon information and belief, Defendant Benjamin Carroll is a citizen and resident of the State of Idaho, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 809. Upon information and belief, Defendant Timothy Borchardt is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 810. Upon information and belief, Defendant Nikolay Sandul is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 811. Upon information and belief, Defendant Luz Mendez is a citizen and resident of the State of Indiana, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 125 of 157

- 812. Upon information and belief, Defendant Davey Sanderson is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 813. Upon information and belief, Defendant Charla Roby is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 814. Upon information and belief, Defendant Rudolph Davis is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 815. Upon information and belief, Defendant Paul Wassell is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 816. Upon information and belief, Defendant Melvin Fox is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 817. Upon information and belief, Defendant Azeem Holman is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 818. Upon information and belief, Defendant Diane Artis is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 126 of 157

- 819. Upon information and belief, Defendant Christine Haynes is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 820. Upon information and belief, Defendant Cleveland Samuels is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 821. Upon information and belief, Defendant Etta DeRizzio is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 822. Upon information and belief, Defendant Robyn Weatherford is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 823. Upon information and belief, Defendant Joshua Kenyon is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 824. Upon information and belief, Defendant Mark Venable is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.
- 825. Upon information and belief, Defendant Robert Wilks, Sr. is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 127 of 157

826. Upon information and belief, Defendant Vacation Ownership Experts is headquartered and/or does business in the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 920 in the Timeshare Plan.

- 827. Upon information and belief, Defendant Cheyenne Lawson is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 828. Upon information and belief, Defendant Erica Everette is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 829. Upon information and belief, Defendant Joyce Clark is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 830. Upon information and belief, Defendant Benjamin Carroll is a citizen and resident of the State of Idaho, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 831. Upon information and belief, Defendant Nikolay Sandul is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 832. Upon information and belief, Defendant Melvin Fox is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 128 of 157

- 833. Upon information and belief, Defendant Cassandra Bland is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 834. Upon information and belief, Defendant Norris Detter is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 835. Upon information and belief, Defendant Etta DeRizzio is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 836. Upon information and belief, Defendant Mark Williams is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 837. Upon information and belief, Defendant Carlisle Goforth, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 838. Upon information and belief, Defendant Mark Venable is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 839. Upon information and belief, Defendant Russell Duncan is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.

- 840. Upon information and belief, Defendant Rosendo Bryden is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 841. Upon information and belief, Defendant Karen Brooks is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.
- 842. Upon information and belief, Defendant Vacation Ownership Experts is headquartered and/or does business in the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 921 in the Timeshare Plan.

- 843. Upon information and belief, Defendant Joseph Gregory is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 844. Upon information and belief, Defendant Donna Martin is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 845. Upon information and belief, Defendant Alan Sneed is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 846. Upon information and belief, Defendant Grover Damron is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 130 of 157

- 847. Upon information and belief, Defendant John Davenport is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 848. Upon information and belief, Defendant David Richardson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 849. Upon information and belief, Defendant Susie Mincey is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 850. Upon information and belief, Defendant Geno Lawson is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 851. Upon information and belief, Defendant Ronald Worsham is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 852. Upon information and belief, Defendant Betty Wilson is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 853. Upon information and belief, Defendant Joanne Sher is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 131 of 157

- 854. Upon information and belief, Defendant Frances Cooper is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 855. Upon information and belief, Defendant Mary Prouty is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 856. Upon information and belief, Defendant Joseph Tonsel, Jr. is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 857. Upon information and belief, Defendant Patricia Carey is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 858. Upon information and belief, Defendant Kenneth Hobson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.
- 859. Upon information and belief, Defendant William Clay is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1101 in the Timeshare Plan.

#### **Delinquent Owners of Unit 1103**

860. Upon information and belief, Defendant Earl Hanvey, Jr. is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 132 of 157

- 861. Upon information and belief, Defendant Leslie Shultz is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 862. Upon information and belief, Defendant Raymond Fletcher is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 863. Upon information and belief, Defendant Joann Cook is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 864. Upon information and belief, Defendant Melissa Hoots is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 865. Upon information and belief, Defendant Wendy Stein is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 866. Upon information and belief, Defendant Marion Hammond is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 867. Upon information and belief, Defendant Sandy Huggins is a citizen and resident of the State of Michigan, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.

- 868. Upon information and belief, Defendant Erica Fisher is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 869. Upon information and belief, Defendant Mamie Murphy is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.
- 870. Upon information and belief, Defendant Damitchell Moore is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1103 in the Timeshare Plan.

- 871. Upon information and belief, Defendant Rosemary Lynch is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 1104 in the Timeshare Plan.
- 872. Upon information and belief, Defendant Juanita Howell is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1104 in the Timeshare Plan.
- 873. Upon information and belief, Defendant Edward Chavis is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1104 in the Timeshare Plan.

#### **Delinquent Owners of Unit 1105**

874. Upon information and belief, Defendant James Byker is a citizen and resident of the State of Michigan, is neither an infant nor incompetent and is a Co-Owner of Unit 1105 in the Timeshare Plan.

- 875. Upon information and belief, Defendant Hubert Jacobs is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1105 in the Timeshare Plan.
- 876. Upon information and belief, Defendant George Davis is a citizen and resident of the State of New Jersey, is neither an infant nor incompetent and is a Co-Owner of Unit 1105 in the Timeshare Plan.
- 877. Upon information and belief, Defendant George Petitt, III is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1105 in the Timeshare Plan.
- 878. Upon information and belief, Defendant Archie Robertson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1105 in the Timeshare Plan.
- 879. Upon information and belief, Defendant LR Rentals Real Estate, LLC is headquartered and/or does business in the State of Washington, is neither an infant nor incompetent and is a Co-Owner of Unit 1105 in the Timeshare Plan.

- 880. Upon information and belief, Defendant Michael Edmunds is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1106 in the Timeshare Plan.
- 881. Upon information and belief, Defendant Paul Porfeli is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1106 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 135 of 157

#### **Delinquent Owners of Unit 1107**

- 882. Upon information and belief, Defendant Richard Goodwin is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1107 in the Timeshare Plan.
- 883. Upon information and belief, Defendant Kimberly Marshall is a citizen and resident of the State of Missouri, is neither an infant nor incompetent and is a Co-Owner of Unit 1107 in the Timeshare Plan.

- 884. Upon information and belief, Defendant Ronald Althenn, II is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1108 in the Timeshare Plan.
- 885. Upon information and belief, Defendant Denorise Allen is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1108 in the Timeshare Plan.
- 886. Upon information and belief, Defendant Donald Kelley is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1108 in the Timeshare Plan.
- 887. Upon information and belief, Defendant William Johnson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1108 in the Timeshare Plan.

- 888. Upon information and belief, Defendant Bill Mills is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1109 in the Timeshare Plan.
- 889. Upon information and belief, Defendant Dijon Taylor is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1109 in the Timeshare Plan.
- 890. Upon information and belief, Defendant Shawntay Anthony is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1109 in the Timeshare Plan.

## **Delinquent Owners of Unit 1110**

- 891. Upon information and belief, Defendant Scott Crane is a citizen and resident of the State of Idaho, is neither an infant nor incompetent and is a Co-Owner of Unit 1110 in the Timeshare Plan.
- 892. Upon information and belief, Defendant Bonnie Goard is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1110 in the Timeshare Plan.

# **Delinquent Owners of Unit 1111**

893. Upon information and belief, Defendant Thomas Pytko is a citizen and resident of the State of Massachusetts, is neither an infant nor incompetent and is a Co-Owner of Unit 1111 in the Timeshare Plan.

894. Upon information and belief, Defendant Clarence Toliver, Jr. is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1111 in the Timeshare Plan.

## **Delinquent Owners of Unit 1112**

895. Upon information and belief, Defendant Gary Hughes is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1112 in the Timeshare Plan.

- 896. Upon information and belief, Defendant Audrey B. Cahill is a citizen and resident of Canada, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 897. Upon information and belief, Defendant Lucia Keiger is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 898. Upon information and belief, Defendant Ervin Tisdale, Sr. is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 899. Upon information and belief, Defendant Jerry Carter is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 900. Upon information and belief, Defendant Cheryl Johnson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 138 of 157

- 901. Upon information and belief, Defendant George Nicholas, Jr. is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 902. Upon information and belief, Defendant Charles Hatcher, Sr. is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 903. Upon information and belief, Defendant David Sosa is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 904. Upon information and belief, Defendant James Smith, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 905. Upon information and belief, Defendant Sandra Isenhour is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 906. Upon information and belief, Defendant Terry Grove is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 907. Upon information and belief, Defendant Doye Young is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 139 of 157

- 908. Upon information and belief, Defendant Timothy Reinke, Sr. is a citizen and resident of the State of Michigan, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 909. Upon information and belief, Defendant Michelle Peters is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 910. Upon information and belief, Defendant Gary Wynn is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 911. Upon information and belief, Defendant James Bogart is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 912. Upon information and belief, Defendant Donna Ganza is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 913. Upon information and belief, Defendant Josy Graham is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.
- 914. Upon information and belief, Defendant Brent Mollette is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 1114 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 140 of 157

- 915. Upon information and belief, Defendant Lucia Keiger is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 916. Upon information and belief, Defendant Ervin Tisdale, Sr. is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 917. Upon information and belief, Defendant Jerry Carter is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 918. Upon information and belief, Defendant Cheryl Johnson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 919. Upon information and belief, Defendant George Nicholas, Jr. is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 920. Upon information and belief, Defendant Charles Hatcher, Sr. is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 921. Upon information and belief, Defendant David Sosa is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 141 of 157

- 922. Upon information and belief, Defendant James Smith, Jr. is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 923. Upon information and belief, Defendant Sandra Isenhour is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 924. Upon information and belief, Defendant Terry Grove is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 925. Upon information and belief, Defendant Doye Young is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 926. Upon information and belief, Defendant Timothy Reinke, Sr. is a citizen and resident of the State of Michigan, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 927. Upon information and belief, Defendant Michelle Peters is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 928. Upon information and belief, Defendant Gary Wynn is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 142 of 157

- 929. Upon information and belief, Defendant James Bogart is a citizen and resident of the State of Tennessee, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 930. Upon information and belief, Defendant Donna Ganza is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 931. Upon information and belief, Defendant Josy Graham is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.
- 932. Upon information and belief, Defendant Brent Mollette is a citizen and resident of the State of Florida, is neither an infant nor incompetent and is a Co-Owner of Unit 1115 in the Timeshare Plan.

- 933. Upon information and belief, Defendant Floyd Daniels, Jr. is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 934. Upon information and belief, Defendant Julie Maloney is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 935. Upon information and belief, Defendant Leonard Clark is a citizen and resident of the State of Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.

- 936. Upon information and belief, Defendant Reginald Hopkins is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 937. Upon information and belief, Defendant Alice Mahon is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 938. Upon information and belief, Defendant Wayne Snow is a citizen and resident of the State of West Virginia, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 939. Upon information and belief, Defendant William Murphy is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.
- 940. Upon information and belief, Defendant MHS Associates, LLC is headquartered and/or does business in the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1116 in the Timeshare Plan.

- 941. Upon information and belief, Defendant Michael Tucker is a citizen and resident of the State of New York, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.
- 942. Upon information and belief, Defendant Linda Bangs is a citizen and resident of the State of Rhode Island, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.

- 943. Upon information and belief, Defendant Tracy Boone is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.
- 944. Upon information and belief, Defendant Kevin Penny is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.
- 945. Upon information and belief, Defendant Emily Jordan is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.
- 946. Upon information and belief, Defendant Andy Boyette is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1117 in the Timeshare Plan.

- 947. Upon information and belief, Defendant William Brisson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1118 in the Timeshare Plan.
- 948. Upon information and belief, Defendant Jimmy Camp is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1118 in the Timeshare Plan.
- 949. Upon information and belief, Defendant Susan Ganson is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1118 in the Timeshare Plan.

- 950. Upon information and belief, Defendant Michelle Hughey is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1118 in the Timeshare Plan.
- 951. Upon information and belief, Defendant Nehemiah Fedd is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1118 in the Timeshare Plan.
- 952. Upon information and belief, Defendant Roland Tomah is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1118 in the Timeshare Plan.

## **Delinquent Owners of Unit 1119**

- 953. Upon information and belief, Defendant John Whitworth is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1119 in the Timeshare Plan.
- 954. Upon information and belief, Defendant April Tyler is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1119 in the Timeshare Plan.
- 955. Upon information and belief, Defendant Van Smith is a citizen and resident of the State of South Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1119 in the Timeshare Plan.
- 956. Upon information and belief, Defendant Lynn Swinney, Jr. is a citizen and resident of the State of Georgia, is neither an infant nor incompetent and is a Co-Owner of Unit 1119 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 146 of 157

#### **Delinquent Owners of Unit 1120**

- 957. Upon information and belief, Defendant Doris Heath is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1120 in the Timeshare Plan.
- 958. Upon information and belief, Defendant Inez Kelly is a citizen and resident of the State of Pennsylvania, is neither an infant nor incompetent and is a Co-Owner of Unit 1120 in the Timeshare Plan.
- 959. Upon information and belief, Defendant Kristin Duncan is a citizen and resident of the State of California, is neither an infant nor incompetent and is a Co-Owner of Unit 1120 in the Timeshare Plan.
- 960. Upon information and belief, Defendant Chris Risby is a citizen and resident of the State of Maryland, is neither an infant nor incompetent and is a Co-Owner of Unit 1120 in the Timeshare Plan.
- 961. Upon information and belief, Defendant Celso Aabano is a citizen and resident of the State of Illinois, is neither an infant nor incompetent and is a Co-Owner of Unit 1120 in the Timeshare Plan.

## **Delinquent Owners of Unit 1121**

- 962. Upon information and belief, Defendant William Thornton is a citizen and resident of the State of North Carolina, is neither an infant nor incompetent and is a Co-Owner of Unit 1121 in the Timeshare Plan.
- 963. Upon information and belief, Defendant Nora Squires is a citizen and resident of the State of Ohio, is neither an infant nor incompetent and is a Co-Owner of Unit 1121 in the Timeshare Plan.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 147 of 157

### **GENERAL ALLEGATIONS**

- 964. Under the Timeshare Plan, the Association operated a forty-unit condominium vacation resort in the Sand Castle South building located at 2207 South Ocean Boulevard, Myrtle Beach, South Carolina.
- 965. Sand Castle South Condo Conversion, LLC ("<u>Grantor/Developer</u>"), as the original Grantor in the Master Deed, converted an existing motel property to a horizontal property regime on or about June 16, 2006 pursuant to the Master Deed recorded in Horry County, South Carolina.
- 966. Thereafter, Grantor/Developer caused the creation of the Timeshare Plan pursuant to the Timeshare Plan Declaration filed on June 22, 2007.
- 967. The Timeshare Plan Declaration created an interval ownership program in which units in the Timeshare Plan and their appurtenant interest in the common elements were conveyed for a defined period of time in blocks known as "<u>Unit Weeks</u>."
  - 968. There is 1,926 Unit Weeks for the 40 Condominiums.
- 969. The Defendants purchased Unit Weeks in the Timeshare Plan from the Grantor/Developer or from a third-party as evidenced by the recording of a deed in the Office of the Register of Deeds for Horry County, South Carolina.
- 970. Each Defendant is the owner of record of the specific Unit Week under the Timeshare Plan set forth in **Exhibit A** and **Exhibit B** attached hereto and incorporated herein by reference.
- 971. On or about September 25, 2013, in conjunction with the sale of certain Unit Weeks it owned, Grantor/Developer assigned its rights as the Developer and Declarant under the Master Deed and the Timeshare Plan Declaration to Festiva Development Group, Inc. ("Festiva").

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 148 of 157

Festiva paid the maintenance fees on these Unit Weeks through 2019. On or about September 9, 2019, Festiva conveyed the 1,254 Unit Weeks to Plaintiff. Plaintiff now owns 1,258.5 Unit Weeks.

- 972. Plaintiff has suffered operating losses for many years, due to the non-payment of maintenance fees by timeshare owners. At the commencement of this Chapter 11 bankruptcy case on May 22, 2019, the Association was owed over \$2 million in unpaid maintenance fees and assessments, resulting in a deficiency in income to pay Plaintiff's operating expenses.
- 973. For the 12-month period ending December 31, 2016, Plaintiff suffered an operating loss of (\$320,490.00); for the 12-month period ending December 31, 2017, Plaintiff suffered an operating loss of (\$452,136.00); for the 12-month period ending December 31, 2018, Plaintiff suffered an operating loss of (\$103,082.89); and for the period of January 1, 2019 through the filing of this case on May 22, 2019, Plaintiff suffered an operating loss of (\$56,262.45).
- 974. Plaintiff obtained loans to provide funds for it to pay its expenses, but it was unable to repay the loans and it continued to incur debts in the course of its operations. The costs to operate the Timeshare Plan exceeded Plaintiff's income.
- 975. Based upon Plaintiff's distressed financial situation and its lack of viable alternatives, in 2019 Plaintiff's Board of Directors (the "**Board**") made the determination that the Association could no longer operate. In May, 2019, Plaintiff discontinued the timeshare operation under the Timeshare Plan.
- 976. Notwithstanding the termination of operation of the Timeshare Plan, Plaintiff continues to incur expenses necessary to protect the property, including maintenance and insurance expenses. Absent a sale of the Condominiums, Plaintiff will be unable to pay these expenses.

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 149 of 157

977. On May 22, 2019, Plaintiff filed for protection under Chapter 11 of the United States Bankruptcy Code (11 U.S.C. §101, *et seq.*), with the goals of enabling and arranging a sale of the Condominiums to pay its expenses and debts and to provide a payment to Active Owners.

978. Plaintiff is informed and believes that, in order to sell the Condominiums for a price sufficient (a) to pay its expenses and debts, and (b) to hopefully realize value for Active Owners, the Timeshare Plan had to be terminated and ownership of the Condominiums consolidated so as to convey full ownership of the Condominiums to a buyer free and clear of timeshare restrictions and covenants.

- 979. During the 123rd Session (2019-2020) of the South Carolina Legislature, the South Carolina General Assembly adopted House Bill 3754, later signed by the South Carolina Governor on May 16, 2019, creating the "Vacation Time Sharing Plan Extension and Termination Act" as set forth in South Carolina Code Section 27-32-500, *et seq.* ("Timeshare Termination Act") to provide a statutory framework for the termination of time sharing plans based on a horizontal property regime structure.
- 980. Pursuant to the Timeshare Termination Act, the Board is required to take all action necessary to wind down the affairs of the Association.
- 981. Plaintiff is informed and believes that it would be contrary to the public policy of the State of South Carolina to require the continued operation of a horizontal property regime such as the Timeshare Plan when to do so constitutes economic waste; and, further, that the continued enforcement of the Timeshare Plan would result in economic waste, loss of value of property, injury to surrounding property owners, and potentially a danger to the safety and welfare of the public as vacant property in a state of disrepair. In this regard, it should be expected that

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 150 of 157

prospective enforcement of the Timeshare Plan would impact and lower property values, and lower property tax values, for surrounding properties.

- 982. Based upon the existing circumstances and the prospective problems, the Board determined that it was in the best interest of all persons concerned, including the Defendants and surrounding property owners, to terminate the Timeshare Plan Declaration and the Timeshare Plan, wind down the affairs of the Association and liquidate the Condominiums, in order to (a) prevent the Timeshare Plan Declaration and/or the Timeshare Plan from impairing the productive use of the property, (b) provide payment to Plaintiff's creditors, (c) allow for fair treatment and just compensation of Active Owners by preserving the value of the property, and (d) preserve the State's long history of protecting homestead property and homestead property rights by ensuring that, to the extent reasonably possible, such protection is extended to Active Owners in the context of termination of the Timeshare Plan Declaration.
- 983. Following notice to all timeshare owner, both Active Owners and Delinquent Owners, on September 13, 2019, the Association held a Special Meeting of the Interval Owners (the "Special Meeting") pursuant to the terms of the Master Deed, the Timeshare Plan Declaration and S.C. Code Ann. §27-32-500, *et seq.*, for the purpose of voting to terminate the Timeshare Plan Declaration and the Timeshare Plan.
- 984. At the Special Meeting on September 13, 2019, owners of over Sixty Percent (60%) of the Unit Weeks under the Timeshare Plan were present, either in person or by proxy, which constituted a quorum pursuant to the terms of the Bylaws of the Association, the Master Deed and the Timeshare Plan Declaration.

- 985. At the Special Meeting, owners of over Sixty Percent (60%) of the Unit Weeks under the Timeshare Plan voted to terminate the Timeshare Plan Declaration and the Timeshare Plan.
- 986. Following the Special Meeting, the Association recorded the <u>Termination of Supplemental Declaration for the Sand Castle South Timeshare Ownership Plan</u> (the "<u>Declaration</u> of <u>Termination</u>") on October 18, 2019 in Deed Book 4253 at Page 599 in the office of the Register of Deeds for Horry County, South Carolina. The Timeshare Plan Declaration and the Timeshare Plan are now terminated.

## FOR A FIRST CAUSE OF ACTION (Partition)

- 987. Plaintiff incorporates the allegations of the preceding paragraphs of this Complaint as if set forth herein verbatim.
- 988. Following termination of the Timeshare Plan Declaration, pursuant to S.C. Code Ann. §27-32-520, the termination of the Timeshare Plan is now binding on all parties having an interest in the property, and that the property interests now held by the Timeshare Owners is that of tenants in common.
- 989. Plaintiff is informed and believes that Plaintiff holds an interest in each of the forty (40) units in the Timeshare Plan along with certain other Delinquent Co-Owners identified on **Exhibit B**.
- 990. Plaintiff is informed and believes that it has the right to partition of the property, consisting of the forty (40) Condominiums, by sale individually or in bulk.
- 991. Plaintiff asserts that the forty (40) Condominiums are not divisible and partition in kind would be neither practicable nor expedient because such a division cannot be fairly and equally made.

992. The Plaintiff is informed and believes that it is entitled to partition of the Condominiums by sale without issuance of a writ, with a division of the sales proceeds being first applied to the costs associated with the termination of the Timeshare Plan Declaration and the Timeshare Plan, second to pay the debts of Plaintiff, and thereafter by distributing the net proceeds to the Active Members of the Association pro-rata.

# FOR A SECOND CAUSE OF ACTION (Sale of Property Pursuant to 11 U.S.C. §§363(h))

- 993. Plaintiff incorporates the allegations of the preceding paragraphs of this Complaint as if set forth herein verbatim.
- 994. As a result of the termination of the Timeshare Plan pursuant to the provisions of S.C. Code Ann. §27-32-520, Plaintiff and the Defendants are owners of the Condominiums as tenants in common.
- 995. Plaintiff is informed and believes that it may sell property under 11 U.S.C. §§ 363(b)(1) and (f), as a sale not in the ordinary course of business free and clear of any interest in the property, and Plaintiff intends to seek to accomplish such a sale after partition of the Condominiums herein.
- 996. Partition of the Condominiums in kind among the estate and the individual Defendants is impracticable.
- 997. Sale of the estate's undivided interest in the Condominiums would realize significantly less value for the estate, and for the other Co-Owners, than the sale of the Condominiums free of the interests of the Defendants and other Co-Owners.
- 998. The benefit to the estate of a sale of the Condominiums free of interests of Co-Owners outweighs the detriment of such a sale, if any, to the Co-Owners.
  - 999. The Condominiums are not used in the production, transmission, or distribution,

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 153 of 157

or sale of electric energy or of natural or synthetic gas for heat, light or power.

1000. Plaintiff is informed and believes that it should be authorized to sell the Condominiums pursuant to 11 U.S.C. §363(h), pay the expenses incurred in such sale and certain obligations of the Association, and distribute the remaining proceeds to the Active Owners.

# FOR A THIRD CAUSE OF ACTION (Setoff Against Interests of Delinquent Owners)

- 1001. Plaintiff incorporates the allegations of the preceding paragraphs of this Complaint as if set forth herein verbatim.
- 1002. The Defendants identified as Delinquent Owners and listed on **Exhibit B** have failed to pay maintenance fees due to Plaintiff as required of every interval owner, and they are indebted to Plaintiff for such unpaid amounts.
- 1003. The Timeshare Plan Declaration and Plaintiff's By-Laws provide for the forfeiture of certain rights of Delinquent Owners, including but not limited to the right to vote or otherwise take part in the management and affairs of the Association.
- 1004. The sale of the Condominiums may generate sale proceeds more than sufficient to pay the expenses incurred by Plaintiff in this case and in the sale, which funds might otherwise be available to pay the Co-Owners.
- 1005. Plaintiff is informed and believes that it is entitled to set off any proceeds from the sale of the Condominiums that would be due or allocable to the Delinquent Owners against the amounts the Delinquent Owners owe to Plaintiff, such that Plaintiff may retain such sale proceeds in payment of the unpaid amounts owed by the Delinquent Owners.

# For a Fourth Cause of Action (Abandonment of Interest and Quiet Title)

1006. Plaintiff incorporates the allegations of the preceding paragraphs of this Complaint as if set forth herein verbatim.

1007. Upon information and belief, numerous Defendants identified and defined as Delinquent Owners herein cannot be located although numerous attempts to contact these Delinquent Owners have been made.

1008. By failing to pay maintenance fees due to the Association pursuant to the Timeshare Plan Declaration, by failing participate in the affairs of the Association and by failing to provide a current address to the Association as required under Section 10.2 of the By-Laws, these Delinquent Owners have effectively abandoned their interest in the Property.

1009. Plaintiff will attempt to serve each of the Delinquent Owners at the Delinquent Owner's last known address consistent with the provisions of the United States Bankruptcy Code (11 U.S.C. § 101, *et seq.*) and Rule 5 of the Federal Rules of Civil Procedure, made applicable herein by Rule 7005 of the Federal Rules of Bankruptcy Procedure, and if such service cannot be accomplished, Plaintiff will seek an Order of Publication from the Court allowing service by Publication consistent with federal and state law.

1010. Upon compliance with said Order of Publication and if no response is received, Plaintiff seeks a judgment of the Court declaring that any such Delinquent Owner that cannot be served has abandoned any interest held by such Delinquent Owner in the Condominiums and the sale proceeds of them (the Condominiums and the sale proceeds, collectively, the "**Property**"), and that the Association holds title to the interest of such Delinquent Owner in the Property

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 155 of 157

allowing a sale free and clear of such interest, dispensing with any ambiguity or cloud that may exist in the chain of title as a result of said abandonment.

1011. The claims of any such Delinquent Owner, if any, to the Property, are adverse to the interest of the Association's bankruptcy estate (the "Estate") and its creditors, and constitute a cloud upon title to the Property adverse to the rights of all other Co-Owners, the Association and the Estate.

1012. Plaintiff is entitled to an Order declaring that any Delinquent Owner that the Plaintiff has attempted to serve by regular mail and by publication pursuant to an Order of this Court and who has failed to respond to the Complaint in a timely manner shall be deemed to have abandoned any right, title and/or interest in the Property held by such Delinquent Owner and such interest is now held by the Plaintiff Association, quieting any such claim or interest and allowing a sale free and clear of the same.

1013. Furthermore, Plaintiff is entitled to an Order of this Court declaring (a) that any such Delinquent Owner is divested of and has forfeited all right, title and interests held in the Property, and (b) any interests or rights these Delinquent Owners may claim in the Property are extinguished by this Court's Order.

## **WHEREFORE**, the Plaintiff prays for an Order of this Court:

- 1. Granting a judgment of partition by sale and directing that the Condominiums may be sold individually or in bulk, with the sales proceeds to be divided according to the rights and interests of the parties, subject to further authorization for a specific sale under 11 U.S.C. §§ 363(b)(1) and (f);
- 2. Granting judgment authorizing Plaintiff to sell the Condominiums under 11 U.S.C.§ 363(h);

Case 19-80101-jw Doc 1 Filed 12/16/19 Entered 12/16/19 10:07:56 Desc Main Document Page 156 of 157

- 3. Granting judgment for Plaintiff against the Delinquent Owners for setoff, by which Plaintiff shall be authorized to retain and apply sale proceeds otherwise due to Delinquent Owners in payment and satisfaction of the indebtedness of the Delinquent Owners to Plaintiff;
- 4. Declaring and directing that the interest of any Delinquent Owner who has not provided a current address and after attempted service and publication has filed no responsive pleading shall be deemed to have forfeited all right, title and interest in and to the Property and that such interest is extinguished of record;
  - 5. Barring the equity of redemption with the proceeds of the sale being applied:
    - (a) First, to the costs and expenses of this action and the bankruptcy case;
  - (b) Second, payment to Plaintiff for its share of the net proceeds representing its ownership interest in each of the units to be paid to the creditors of the Association;
  - (c) Third, payment to Plaintiff of the portion of the sale proceeds that would otherwise be allocated to Delinquent Owners, pursuant to Plaintiff's setoff rights against the proceeds otherwise payable to Delinquent Owners, for Plaintiff's use in making payment to its creditors; and
  - (d) Fourth, the remainder of the proceeds from the sale of the Condominiums to be held by Plaintiff and distributed according to the terms of the confirmed Chapter 11 plan; and
  - 6. Granting such other and further relief as the Court deems just and proper.

/s/ Julio E. Mendoza, Jr.

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Attorneys for Sand Castle South Timeshare Association, Inc.

December 13, 2019 Columbia, South Carolina